

70305-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Raymond E. McCreary
Paragon Household Products, Inc.
P.O. Box 2169
233 Clifton Blvd.
Clifton, NJ 07015

JAN 31 2006

Dear Mr. McCreary:

Subject: Revised Basic Confidential Statement of Formula
Para Moth Flakes
EPA Registration No. 70305-3
Submission Date: January 13, 2006

The Agency has reviewed your submission for a revised Confidential Statement of Formula, and the following comment applies:

The Confidential Statement of Formula dated January 13, 2006 for the basic formulation agrees with the label claim in compliance with PR Notice 91-2 and is acceptable.

The Confidential Statement of Formula has been added to your file as part of the record. If you have any questions concerning this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Note To File

**The revised basic Confidential Statement of
Formula dated January 13, 2006 was
reviewed and accepted by Kable Bo Davis on
January 31, 2006.**

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (973) 591-0777
Fax: (973) 591-0770

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Daniel C. Kenny, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)
Office of Pesticides Programs
USEPA Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

January 13, 2006


Subject: Revised Confidential Statement of Formula for:
Para Moth Balls, EPA Registration No. 70305-1,
Cedar Scented Para Moth Balls, EPA Registration No. 70305-2,
Para Moth Flakes, EPA Registration No. 70305-3.

Dear Mr. Kenny,

This is in response to your letters dated December 20, 2005 requesting submission within 30 days of revised Confidential Statement of Formula (CSF) for our three pesticide product above referenced. Specifically you requested, that due to voluntary cancellation of the registration of the active ingredient para-dichlorobenzene (EPA Reg. No. [REDACTED] as source for our basic formulations, we must use a new source product to replace that which was cancelled.

Please be advised that we have made arrangements with [REDACTED] to use their registered source product of technical grade active ingredient for our products. The new source product has the registration number [REDACTED]. To this end, please find enclosed revised CSFs for the products EPA Registration Numbers 70305-1, 70305-2, and 70305-3. Should there be any questions regarding this matters, please do not hesitate to call me at 973-591-0777.

Sincerely,


Raymond E. McCreary, President
Paragon Household Products, Inc.

Enclosures

Product ingredient source information may be entitled to confidential treatment



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

| | | | |
|--|---|--|--|
| United States Environmental Protection Agency Washington, DC 20460 | | <input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other | OPP Identifier Number |
| Application for Pesticide - Section I | | | |
| 1. Company/Product Number 70305-3 | | 2. EPA Product Manager Daniel C. Kenny | |
| 4. Company/Product (Name) PARA MOTH FLAKES | | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted | |
| 5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products, Inc. P.O. Box 2169 233 Clifton Blvd. Clifton, N.J 07015 <input type="checkbox"/> Check if this is a new address | | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |
| Section - II | | | |
| <input type="checkbox"/> Amendment - Explain below. | | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ | |
| <input type="checkbox"/> Resubmission in response to Agency letter dated Dec. 20, 2005 | | <input type="checkbox"/> "Me Too" Application. | |
| <input type="checkbox"/> Notification - Explain below. | | <input checked="" type="checkbox"/> Other - Explain below. | |
| Explanation: Use additional page(s) if necessary. (For section I and Section II.) Revised CSF | | | |
| Section - III | | | |
| 1. Material This Product Will Be Packaged In: | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ |
| * Certification must be submitted | | | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | |
| | | 5. Location of Label Directions <input type="checkbox"/> | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | |
| Section - IV | | | |
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Raymond E. McCreary | | Title President | |
| | | Telephone No. (Include Area Code) 973-591-0777 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamped) |
| 2. Signature | | 3. Title President | |
| 4. Typed Name Raymond E. McCreary | | 5. Date January 13, 2006 | |
| | | | |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

CERTIFIED

Raymond E. McCreary
Paragon Household Products, Inc.
P.O. Box 2169
233 Clifton Blvd.
Clifton, NJ 07015

DEC 20 2005

Dear Mr. McCreary:

Subject: Confidential Statement of Formula; Cancellation of Source Product
Para Moth Flakes
EPA Registration No. 70305-3

Review of our files has indicated that the product referenced above lists Para-dichlorobenzene (EPA Registration No. [REDACTED]) as a source product for the basic formulation. Please be advised that this source product has been cancelled and will no longer be available for use in any formulation. Therefore, in order to update the basic formulation for your product, a new source product must be used to replace that which was cancelled.

Please submit a revised Confidential Statement of Formula for the basic formulation incorporating the appropriate revisions to address the concerns identified above. Your response is required within thirty (30) days of the date of this letter. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Raymond E. McCreary
Paragon Household Products, Inc.
P.O. Box 2169
233 Clifton Blvd.
Clifton, NJ 07015

DEC 6 2005

Dear Mr. McCreary:

Subject: Labeling Amendment; Response to PR Notice 2001-1
Para Moth Flakes
EPA Registration No. 70305-3
Submission Date: September 7, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para
Moth Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

NET WT. 10 oz (283.5 g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....100%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3
EPA Est. No. 70305-NJ-01

Left and Right Side Panels

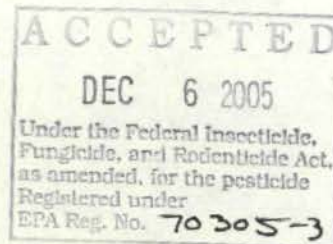
**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para Moth
Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the

following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015**



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

| | | | |
|--|--|--|---|
| United States Environmental Protection Agency Washington, DC 20460 | | <input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other | OPP Identifier Number |
| Application for Pesticide - Section I | | | |
| 1. Company/Product Number 70305/70305-3 | | 2. EPA Product Manager Dan Kenny | |
| 4. Company/Product (Name) Para Moth Flakes | | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted | |
| 5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products Inc. P.O.ox 2169, 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address | | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |
| Section - II | | | |
| <input checked="" type="checkbox"/> Amendment - Explain below. | | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ | |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | | <input type="checkbox"/> "Me Too" Application. | |
| <input type="checkbox"/> Notification - Explain below. | | <input type="checkbox"/> Other - Explain below. | |
| Explanation: Use additional page(s) if necessary. (For section I and Section II.) Response to PR Notice 2001-1 | | | |
| Section - III | | | |
| 1. Material This Product Will Be Packaged In: | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ |
| * Certification must submitted If "Yes" Unit Packaging wgt. No. per container | | If "Yes" Package wgt No. per container | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container | | 4. Size(s) Retail Container 5 & 10 oz | |
| | | 5. Location of Label Directions <input checked="" type="checkbox"/> | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____ | | | |
| Section - IV | | | |
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Raymond E. McCreary | | Title President | |
| | | Telephone No. (Include Area Code) 973-591-0777 | |
| 2. Signature | | 3. Title President | |
| 4. Typed Name Raymond E. McCreary | | 5. Date September 7, 2005 | |
| I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | 6. Date Application Received (Stamped) | |

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (973) 591-0777
Fax: (973) 591-0770

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Document Processing Desk (AMEND)
Office of Pesticides Programs (7504-C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001

RE: Label Amendment Applications

Dear Sir/Madam,

Please find enclosed label amendment applications (EPA Form 8570-1) for our products "Para Moth Balls" EPA Reg. No. 70305-1, "Para Moth Balls Cedar Scented" EPA Reg. No. 70305-2, and "Para Moth Flakes" EPA Reg. No. 70305-3. These amendments are in response to PR Notice 2001-1, revising the First Aid Statements. Please also find enclosed five (5) copies of draft labels for each product. I trust these revisions are in accordance with the provisions of the above-mentioned PR Notice.

Thank you for your time and consideration. Should there be any questions, please contact me at 973-591-0777.

Sincerely,

Raymond E. McCreary, President
Paragon Household Products Inc.

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460
EXPEDITED REVIEW

☐
☒
☐

Registration
Amendment
Other

OPP Identifier Number

250716

Application for Pesticide - Section I

| | | |
|--|---|--|
| 1. Company/Product Number 70305-3 | 2. EPA Product Manager Daniel B. Peacock | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) PARA MOTH FLAKES | PM# 32 | |
| 5. Name and Address of Applicant (Include ZIP Code) PARAGON HOUSEHOLD PRODUCTS, INC. P.O. Box 2169 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70305-1 Product Name PARA MOTH BALLS | |

Section - II

| | | |
|--|--|------------------------------------|
| <input checked="" type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated | NOTIFICATION OCT 30 1998 |
| <input type="checkbox"/> Resubmission in response to Agency letter dated | <input type="checkbox"/> "Me Too" Application. | |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. | |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Amendment for Label Changes per PR Notice 95-2. This Amendment is consistent with the provisions of the PR Notice 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of -- see attached --"

Section - III

| | | | | | |
|--|--|---|--|--|--|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | |
| | | | | <input type="checkbox"/> Plastic | |
| | | | | <input type="checkbox"/> Glass | |
| | | | | <input checked="" type="checkbox"/> Paper | |
| | | | | <input type="checkbox"/> Other (Specify) | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container | | 4. Size(s) Retail Container 5 to 15 oz | | 5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other | | | |

Section - IV

| | | | | | |
|--|--|-----------------------|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | | | |
| Name Raymond E. McCreary | | Title President | | Telephone No. (Include Area Code) 973-591-0777 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | | | 6. Date Application Received (Stamped) 3/5/99 |
| 2. Signature | | 3. Title President | | | |
| 4. Typed Name Raymond E. McCreary | | 5. Date 10/15/98 | | | |

Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

**Para
Moth Flakes**

**TO KILLS CLOTHES MOTHS (Larvae and Adults)
AND CARPET BEETLES
IN AIR-TIGHT CONTAINERS AND STORAGE CLOSETS**

NET WT.

ACTIVE INGREDIENTS:

| | |
|--------------------------|--------|
| Paradichlorobenzene..... | 99.5% |
| INERT INGREDIENTS | 0.5% |
| TOTAL | 100.0% |

KEEP OUT OF REACH OF CHILDREN
WARNING
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3
EPA Est. No. 70305-NJ-01

Left & Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

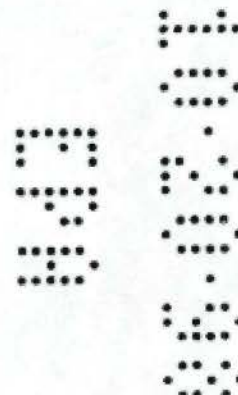
**Para
Moth
Flakes**

**KILLS CLOTHES MOTHS (Larvae and Adults)
AND CARPET BEETLES**

**FRESHENS, PROTECTS
AND DEODORIZES
CLOTHING AND
FABRICS**

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015

NOTIFICATION
OCT 30 1998



Back Panel

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin.

Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical in this product causes cancer based on tests performed on laboratory animals.

STATEMENT OF PRACTICAL TREATMENT:

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of water. Avoid alcohol.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes and get medical attention.

IF ON SKIN: Wash with soap and plenty of water. If irritation develops, get medical attention.

NOTE : Probable mucosal damage may contraindicate the use of gastric lavage..

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTHS AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

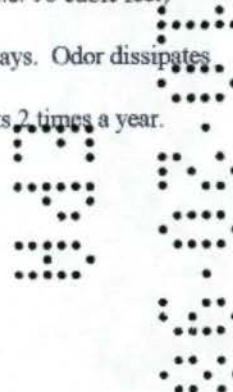
| Pound of Product | Area of Tightly Enclosed Space |
|------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 3 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moth are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015



PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (201) 591-0777
Fax: (201) 591-0770

CERTIFIED MAIL
RETURN RECEIPT REQUIRED

U.S. EPA
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504C)
401 M. Street S.W.
Washington, D.C. 20460-0001

RE: Application for Amendment
EPA File Symbol 70305-3

October 15, 1998

Dear Sir/Madam:

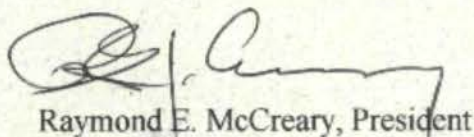
This is regarding the Application for "Pesticide Amendment" concerning our product "PARA MOTH FLAKES", EPA Reg. No. 70305-3. For economical reasons, and label consistency with our other two similar products, "PARA MOTH BALLS", EPA Reg. No. 70305-1, and "PARA MOTH BALLS CEDAR SCENTED", EPA Reg. No. 70305-2, we suggest that the label of the "PARA MOTH FLAKES" be changed to reflect the language on the label of the similar products mentioned above.

Please find enclosed the following:

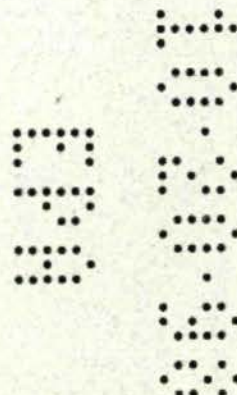
- Application for Pesticide Amendment form;
- Copy of the most recent EPA-accepted labels for this product;
- 5 copies of proposed label.

Should you have any questions regarding this letter, please contact me at 973-591-0777.

Sincerely,


Raymond E. McCreary, President

Enclosures



PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (201) 591-0777
Fax: (201) 591-0770

*Final Label
(same)*

CERTIFIED MAIL
RETURN RECEIPT REQUIRED

Mr. Robert Brennis, Product Manager Team 32
Antimicrobial Division, H7505C
U.S. EPA
401 M. Street, S.W.
Washington, D.C. 20460

Re: Conditional Registration -- Para Moth Flakes
EPA Reg. No. 70305-3

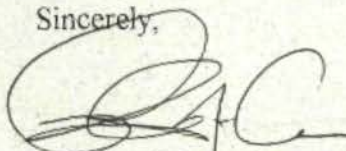
September 23, 1997

Dear Mr. Brennis:

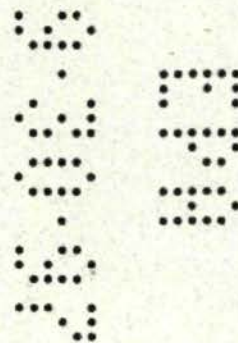
This is regarding the Conditional Registration of our product "Para Moth Flakes", EPA Reg. No. 70305-3, granted by EPA on September 8, 1997

As indicated in your September 8, 1997 letter, we revised the label of the above product to reflect the changes required. Please find enclosed five (5) copies of the product's final printed labeling.

Sincerely,


Raymond E. McCreary, President
PARAGON HOUSEHOLD PRODUCTS INC.

Enclosures



US ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDES PROGRAMS
REGISTRATION DIVISION (75-767)
WASHINGTON, DC 20460

EPA REGISTRATION NO.

70305-3

DATE OF ISSUANCE

SEP - 8 1991

TERM OF ISSUANCE

Conditional

NAME OF PESTICIDE PRODUCT

Para Moth Flakes

NOTICE OF PESTICIDE: ☒ REGISTRATION
☐ REREGISTRATION

(Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended)

NAME AND ADDRESS OF REGISTRANT (Include ZIP code)

Paragon Household Product, Inc.
233 Clifton Blvd.
Clifton, NJ 07015

NOTE: Changes in labeling formula differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above U.S. EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby Registered/Reregistered under the Federal Insecticide, Fungicide, and Rodenticide Act.

A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.

Registration is in no way to be construed as an indorsement or approval of this product by this Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4 when the Agency requires all registrants of similar product to submit such data.

2. Make the labeling changes listed below before you release the product for shipment:

- a. Add the phrase "EPA Registration No. 70305-3".
- b. Revise the Environmental Hazards to read as follows:

"This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

☐ ATTACHMENT IS APPLICABLE

SIGNATURE OF APPROVING OFFICIAL

[Signature]

DATE

Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA".

- c. Under the "Statement of Practical Treatment" change "Eye Contact" to Read "If In Eyes" and "Skin Contact" to read "IF on Skin".
 - d. Under the "Statement of Practical Treatment" add the phrase "Note To Physician: Never administer adrenalin for overexposure. Increased sensitivity of the heart to adrenalin may occur".
3. Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,



Robert S. Brennis
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7504C)

Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

**Para
Moth Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

NET WT. 10 oz (283.5 g)

ACTIVE INGREDIENTS:
Paradichlorobenzene..... 100%

WARNING
KEEP OUT OF REACH OF CHILDREN
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-R *G*
EPA Est. No. 70305-NJ-01

Left & Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

**Para
Moth
Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

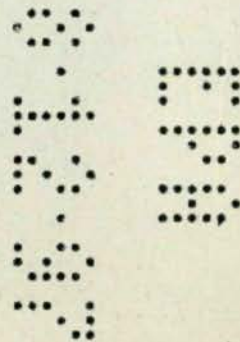
**FRESHENS, PROTECTS
AND DEODORIZES
CLOTHING AND
FABRICS**

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP - 8 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 70305-3



Back Panel

PRECAUTIONARY STATEMENTS:
HAZARD TO HUMANS AND DOMESTIC ANIMALS

DO NOT GET IN EYES OR ON SKIN. Wear full protective gear including goggles/face shield, Viton/Nitrile gloves and boots.

WASH THOROUGHLY AFTER HANDLING.

USE ADEQUATE VENTILATION: Ventilation must be sufficient to keep air concentration levels below OSH permissible limits (75 ppm-8 hour TWA).

DO NOT BREATHE VAPOR OR DUST.

KEEP AWAY FROM HEAT OR FLAMES. Combustible solid. Flash point 150(F) (66C), TCC.

ENVIRONMENTAL HAZARD: This product is toxic to fish. Do not discharge effluent containing this active ingredient into lakes, streams, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

PHYSICAL OR CHEMICAL HAZARD: Vapor concentrations of paradichlorobenzene >50 ppm have been reported to cause irritation to the skin, eyes, and throat in humans. Repeated excessive exposure can cause liver and kidney damage.

WARNING:
HARMFUL IF SWALLOWED OR INHALED
COMBUSTIBLE
KEEP OUT OF REACH OF CHILDREN

STATEMENT OF PRACTICAL TREATMENT:

IF SWALLOWED: Do NOT induce vomiting. Drink large quantities of water. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Get immediate medical attention.

EYE CONTACT: Flush immediately with plenty of water for at least 15 minutes and get medical attention.

SKIN CONTACT: Immediately wash with soap and plenty of water. Remove contaminated clothing. If irritation develops, get medical attention.

IF INHALED: Remove patient to fresh air. If not breathing, give artificial respiration. Get immediate medical attention.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

Para Moth Flakes can be used anywhere that clothes or fabric protection is desired - closets, drawers, chests, garment bags and storage trunks. Thoroughly brush or clean articles to be stored. Use 10 ounces of Para Moth Flakes for each 50 cubic feet of confined storage space. Distribute Moth Flakes evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with Para Moth Balls Flakes. Moth Flakes will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene Moth Flakes should not be mixed or placed in contact with Naphthalene Moth Balls or Flakes. Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP - 8 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 70305-3

STORAGE AND DISPOSAL

STORAGE

- Keep away from flames and heat. Store in a cool, dry place, paradichlorobenzene melts at 53 C (127.4 F).
- IN CASE OF SPILL: Scrape and shovel into sealable containers for proper disposal. Wear appropriate protective gear.

PESTICIDE DISPOSAL

- DO NOT CONTAMINATE WATER, FOOD, OR FEED.
- Pesticides wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.
- Discarded or spilled para-dichlorobenzene is hazardous waste (RCRA Hazardous Waste No. U-072).
- EMPTY CONTAINER becomes hazardous waste and retains vapor and product residue. Observe all label and MSDS safeguards until container is disposed of according to Federal, State and local regulations.

CONTAINER DISPOSAL

- Completely empty bag into application equipment. Then dispose of empty bag in a permitted sanitary waste landfill or by approved incineration.

Ask for and review Material Safety Data Sheet (MSDS) for detailed safety, health effects spill and disposal information.

DICHLOROBENZENE, para, solid.

UN 1592 RQ 100 lbs/45.4 kgs. ORMA-A

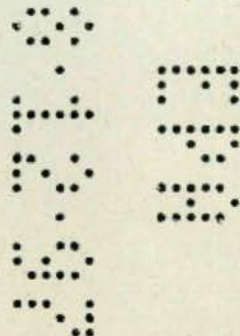
Emergency telephone number (302) 834-4536

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP - 8 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 70305-3



Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

Para
Moth Flakes

KILLS MOTHS AND
CARPET BEETLES

NET WT. 10 oz (283.5g)

ACTIVE INGREDIENTS:
Paradichlorobenzene..... 100%

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SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3
EPA Est. No. 70305-NJ-01

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

Para
Moth
Flakes

KILLS MOTHS AND
CARPET BEETLES

FRESHENS, PROTECTS
AND DEODORIZES
CLOTHING AND
FABRICS

NOT REVIEWED
in accordance with PR Notice 82-2.
Based on Draft Labeling Dated

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

DO NOT GET IN EYS OR ON SKIN. Wear full protective gear including goggles/face shield, Viton/Nitrile gloves and boots. WASH THOROUGH AFTER HANDLING.

USE ADEQUATE VENTILATION. Ventilation must be sufficient to keep air concentration levels below OSHA permissible limits (75 ppm - 8 hour TWA). DO NOT BREATHE VAPOR OR DUST.

KEEP AWAY FROM HEAT OR FLAMES. Combustible solid. Flash point 150(F)(66C), TCC.

ENVIRONMENTAL HAZARD: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

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COMBUSTIBLE
KEEP OUT OF REACH OF CHILDREN

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IF SWALLOWED: DO NOT induce vomiting. Drink large quantities of water. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Get immediate medical attention.

IF IN EYES: Flush immediately with plenty of water for at least 15 minutes and get medical attention.

IF ON SKIN: Immediately wash with soap and plenty of water. Remove contaminated clothing. If irritation develops, get medical attention.

IF INHALED: Remove patient to fresh air. If not breathing, give artificial respiration. Get immediate medical attention.

NOTE TO PHYSICIAN: Never administer adrenalin for overexposure. Increased sensitivity of the heart to adrenalin may occur.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
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Para Moth Flakes can be used anywhere that clothes or fabric protection is desired - closets, drawers, chests, garment bags and storage trunks. Thoroughly brush or clean articles to be stored. Use 10 ounces of Para Moth Flakes for each 50 cubic feet of confined storage space. Distribute Moth Flakes evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times for at least 7 days after protecting with Para Moth Flakes. Moth Flakes will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

NOT REVIEWED
In accordance with FR Notice 82-2.
Based on Draft Labeling Dated

Paradichlorobenzene Moth Flakes should not be mixed or placed in contact with Naphthalene Moth Balls or Flakes. Do not use storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

STORAGE AND DISPOSAL

STORAGE

- Keep away from flames and heat. Store in a cool, dry place, paradichlorobenzene melts at 53C (127.4F).
IN CASE OF SPILL: Scrape and shovel into sealable containers for proper disposal. Wear appropriate protective gear.

PESTICIDE DISPOSAL

- DO NOT CONTAMINATE WATER, FOOD, OR FEED
- Pesticides wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes can not be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.
- Discarded or spilled paradichlorobenzene is hazardous waste (RCRA Hazardous Waste No. U-072).
- EMPTY CONTAINER becomes hazardous waste and retains vapor and product residue. Observe all label and MSDS safeguards until container is disposed of according to Federal, State and local regulations.

CONTAINER DISPOSAL

- Completely empty bag into application equipment; then dispose of empty bag in a permitted sanitary waste landfill or by approved incineration.

Ask for and review Material Data Safety Sheet (MSDS) for detailed safety, health effects, spill and disposal information.

DICHLOROBENZENE, para, solid.

UN 1592 RQ 100 lbs.45.4. kgs. ORMA-A

Emergency telephone number (302) 834-4536

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015

NOT REVIEWED
In accordance with PR Notice 82-2.
Based on Draft Labeling Dated

FRONT END PROCESSING FORM TO FILE ROOM

DATE 8/19

FILE NUMBER 70305-G

☒ No Data - File Room "Make Ready for 32-R. Brennan
(PM or Individual)

☐ Data - File Room "Assign Jacket to Shelf"

☐ Rejected - File Room "Assign Jacket to Rejected Shelf"



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

08/18/97

RAYMOND E MCCREARY
PARAGON HOUSEHOLD PRODUCTS INC
233 CLIFTON BLVD
CLIFTON NJ 07015

PRODUCT NAME: PARA MOTH FLAKES
COMPANY NAME: PARAGON HOUSEHOLD PRODUCTS INC
OPP IDENTIFICATION NUMBER: 258235
EPA FILE SYMBOL: 70305-G
EPA RECEIPT DATE: 08/12/97

SUBJECT: RECEIPT OF APPLICATION FOR A NEW ME-TOO REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new 'me-too' registration and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Robert Brennis, Product Manager 32, at (703)-308-6346.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. White".

Front End Processing Staff
Information Services Branch
Program Management and Support Division

Pendaj - Frances

70305-6



United States
Environmental Protection Agency
Washington, DC 20460
Expedited Review

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

258235

Application for Pesticide - Section I

| | | |
|--|--|--|
| 1. Company/Product Number 70305- R G | 2. EPA Product Manager | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) PARA MOTH FLAKES | PM# 32 | |
| 5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70305-1 Product Name PARA MOTH BALLS | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input checked="" type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

| | | | | | |
|---|--|---|-----------------------|--|--|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | |
| * Certification must be submitted | | | | <input type="checkbox"/> Plastic | |
| | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt. | <input checked="" type="checkbox"/> Glass | |
| | | | | <input type="checkbox"/> Paper | |
| | | | | <input type="checkbox"/> Other (Specify) _____ | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container | | 4. Size(s) Retail Container 5.0/10.0/15.0 oz | | 5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product | | <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | |
|--|-----------------------|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | |
| Name Raymond E. McCreary | Title President | Telephone No. (Include Area Code) 201-591-0777 |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | 6. Date Application Received (Stamped) |
| 2. Signature | 3. Title President | |
| 4. Typed Name Raymond E. McCreary | 5. Date 8/5/97 | |

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which labels are affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, reregistration, etc.

- 1-5. Self-explanatory. ...
6. EPA Use Only.



United States
Environmental Protection Agency
Washington, DC 20460
Expedited Review

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

258235

Application for Pesticide - Section I

| | | |
|--|--|--|
| 1. Company/Product Number 70305- R <i>G</i> | 2. EPA Product Manager | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) PARA MOTH FLAKES | PM# 32 | |
| 5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70305-1 Product Name PARA MOTH BALLS | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input checked="" type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

| | | | |
|--|--|--|---|
| 1. Material This Product Will Be Packaged In: | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ |
| * Certification must be submitted | | | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container | 4. Size(s) Retail Container 5.0/10.0/15.0 oz | 5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | |

Section - IV

| | | | |
|---|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Raymond E. McCreary | | Title President | |
| | | Telephone No. (Include Area Code) 201-591-0777 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamp) |
| 2. Signature | | 3. Title President | |
| 4. Typed Name Raymond E. McCreary | | 5. Date 8/5/97 | |
| | | | |

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INSTRUCTIONS: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
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Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which labels are affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me too", reregistration, etc.

- 1-5. Self-explanatory. . . .
6. EPA Use Only.



Certification with Respect to Citation of Data

Applicants Name and Address

PARAGON HOUSEHOLD PRODUCTS, INC.
P.O. BOX 2169 233 CLIFTON BLVD.
CLIFTON, NEW JERSEY 07015

EPA File Symbol/Registration Number

70305-R G

Product Name

PARA MOTH FLAKES

Date of Application

8/5/97

NOTE: If your product is a 100% repackaging of another EPA-registered product that you purchase, and is labeled for the same uses, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product that is identical or substantially similar and that is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application. (Check the appropriate boxes, in items 2 and 3, or 4 below that pertain to your application.)

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study.

☐ I am the original submitter*; or

☐ I have obtained the written permission of the original submitter for _____, which is
(insert name of chemical)
_____ (for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study;

a. ☐ I am the original data submitter*; or

☐ I have obtained the written permission of the original data submitter for _____, which is
(insert name of chemical)
_____ (for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*; or

b. ☒ I have notified in writing the companies See attached list for 1,4 dichlorobenzene ~~that~~
(insert names of companies) (insert name of chemical)

have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(F) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA); and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are:

Companies See attached list for 1,4 dichlorobenzene (for multiple
(insert names of companies) (insert name of chemical)

chemicals link the companies who are original data submitters with the appropriate chemical name) listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all method or selective method or selective method*). (Also, sign the General Offer Statement below.)

Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)

~~chemicals link the companies who are original data submitters with the appropriate chemical name) that have submitted the studies which I have cited (Selective method*).~~

4. ☐ I certify that for each study cited in support of this application I am not required to offer data compensation or obtain written permission because all time periods for exclusive use and data compensation have expired.

* A Data Matrix identifying these studies is attached. (Note: a Data Matrix is not required under the cite-all method)

Signature

Name and Title

Raymond E. McCreary, Pres.

Date 8/5/97

General Offer to Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required.

Signature

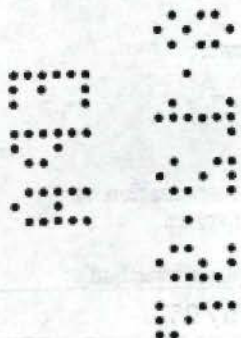
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Raymond E. McCreary, Pres.

Date 8/5/97

Paperwork Reduction Act Notice

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method or cite-all option under Selective Method*). (Also, sign the General Offer Statement below.)
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Signature

Name and Title

Raymond E. McCreary, Pres.

Date

8/5/97

General Offer to Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required.

Signature

Name and Title

Raymond E. McCreary, Pres.

Date

8/5/97

Consent to Release of Data

Project Name: TARA NORTH REARERS

LABORATORY HOUSEHOLD PRODUCTS, INC.
P.O. BOX 2102, 253 CANTON BLVD.
CLEVELAND, NEW JERSEY 07021

NOTE: This document is a 1997 revision of another EPA consent form. It is intended to be used for the release of data from the TARA North Rearers project. You must attach this document to the release of data from the TARA North Rearers project.

The release of data is subject to the following conditions: 1. The release of data is subject to the approval of the EPA. 2. The release of data is subject to the approval of the TARA North Rearers project. 3. The release of data is subject to the approval of the Laboratory Household Products, Inc.

Paperwork Reduction Act Notice

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I have reviewed the written statement of the TARA North Rearers project and the Laboratory Household Products, Inc. and I have determined that the release of data from the TARA North Rearers project is in the public interest.

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United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

PARAGON HOUSEHOLD PRODUCTS, INC.
P.O. BOX 2169 233 CLIFTON BLVD.
CLIFTON, NEW JERSEY 07015

EPA File Symbol/Registration Number

70305-R *GI*

Product Name

PARA MOTH FLAKES

Date of Confidential Statement of Formula (EPA Form 8570-4)

* 8/5/97 *

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

1,4 Dichlorobenzene

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).
- OR
- ☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source

| Active Ingredient | Product Name | Registration Number |
|---------------------|--------------|---------------------|
| 1,4 Dichlorobenzene | [REDACTED] | [REDACTED] |

Product ingredient source information may be entitled to confidential treatment

Signature

Name and Title

Raymond E. McCreary, Pres.

Date

8/5/97

Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to average 1.5 hours per response, including familiarization with the form, organizing the necessary information, and completing the form. Send any comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

Chief, Information Policy Branch, PM-223
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

and to

Office of Management and Budget
Paperwork Reduction Project (2070-0060)
Washington, DC 20503

[illegible]



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

PARAGON HOUSEHOLD PRODUCTS, INC.
P.O. BOX 2169 233 CLIFTON BLVD.
CLIFTON, NEW JERSEY 07015

EPA File Symbol/Registration Number

70305-R G

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Source

| Active Ingredient | Product Name | Registration Number |
|---|--|---------------------|
| 1,4 Dichlorobenzene | [REDACTED] | [REDACTED] |
| <div style="text-align: right;"> </div> | | |
| Signature | Name and Title Raymond E. McCreary, Pres. | Date 8/5/97 |

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U.S. Environmental Protection Agency
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Washington, DC 20460

and to

Office of Management and Budget
Paperwork Reduction Project (2070-0060)
Washington, DC 20503

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (201) 591-0777
Fax: (201) 591-0770

Certification with Respect to Citation of Data - Supplement

FOR CITE-ALL OPTION:

Companies on Data Submitter's List whom have been contacted:

HYSAN CORP.

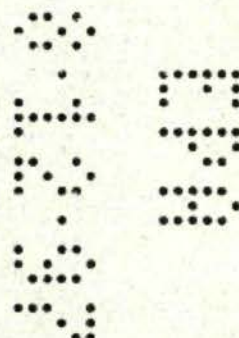
300 West 139th Street
Blue Island, IL 60406

L. SCHNEID, INC.

1429 Fairmont Avenue, N.W.
Atlanta, GA 30381

CHURCH & DWIGHT Co., Inc.

469 North Harrison Street
Princeton, NJ 08543



Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

**Para
Moth Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

NET WT. 10 oz (283.5 g)

ACTIVE INGREDIENTS:
Paradichlorobenzene..... 100%

WARNING
KEEP OUT OF REACH OF CHILDREN
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-R-G
EPA Est. No. 70305-NJ-01

Left & Right Side Panels

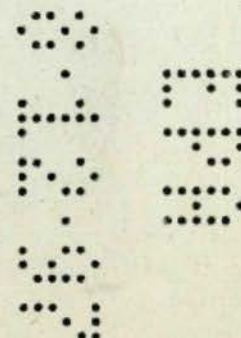
PARAGON
HOUSEHOLD PRODUCTS INC.

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Moth
Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

**FRESHENS, PROTECTS
AND DEODORIZES
CLOTHING AND
FABRICS**

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015



Back Panel

PRECAUTIONARY STATEMENTS:
HAZARD TO HUMANS AND DOMESTIC ANIMALS

DO NOT GET IN EYES OR ON SKIN. Wear full protective gear including goggles/face shield, Viton/Nitrile gloves and boots.

WASH THOROUGHLY AFTER HANDLING.

USE ADEQUATE VENTILATION: Ventilation must be sufficient to keep air concentration levels below OSH permissible limits (75 ppm-8 hour TWA).

DO NOT BREATHE VAPOR OR DUST.

KEEP AWAY FROM HEAT OR FLAMES. Combustible solid. Flash point 150(F) (66C), TCC.

ENVIRONMENTAL HAZARD: This product is toxic to fish. Do not discharge effluent containing this active ingredient into lakes, streams, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

PHYSICAL OR CHEMICAL HAZARD: Vapor concentrations of paradichlorobenzene >50 ppm have been reported to cause irritation to the skin, eyes, and throat in humans. Repeated excessive exposure can cause liver and kidney damage.

WARNING:
HARMFUL IF SWALLOWED OR INHALED
COMBUSTIBLE
KEEP OUT OF REACH OF CHILDREN

STATEMENT OF PRACTICAL TREATMENT:

IF SWALLOWED: Do NOT induce vomiting. Drink large quantities of water. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Get immediate medical attention.

EYE CONTACT: Flush immediately with plenty of water for at least 15 minutes and get medical attention.

SKIN CONTACT: Immediately wash with soap and plenty of water. Remove contaminated clothing. If irritation develops, get medical attention.

IF INHALED: Remove patient to fresh air. If not breathing, give artificial respiration. Get immediate medical attention.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

Para Moth Flakes can be used anywhere that clothes or fabric protection is desired - closets, drawers, chests, garment bags and storage trunks. Thoroughly brush or clean articles to be stored. Use 10 ounces of Para Moth Flakes for each 50 cubic feet of confined storage space. Distribute Moth Flakes evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with Para Moth Balls Flakes. Moth Flakes will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene Moth Flakes should not be mixed or placed in contact with Naphthalene Moth Balls or Flakes. Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

STORAGE AND DISPOSAL

STORAGE

- Keep away from flames and heat. Store in a cool, dry place, paradichlorobenzene melts at 53 C (127.4 F)
- IN CASE OF SPILL: Scrape and shovel into sealable containers for proper disposal. Wear appropriate protective gear.

PESTICIDE DISPOSAL

- DO NOT CONTAMINATE WATER, FOOD, OR FEED.
- Pesticides wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.
- Discarded or spilled para-dichlorobenzene is hazardous waste (RCRA Hazardous Waste No. U-072).
- EMPTY CONTAINER becomes hazardous waste and retains vapor and product residue. Observe all label and MSDS safeguards until container is disposed of according to Federal, State and local regulations.

CONTAINER DISPOSAL

- Completely empty bag into application equipment. Then dispose of empty bag in a permitted sanitary waste landfill or by approved incineration.

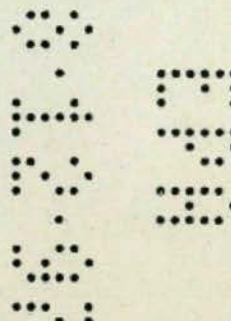
Ask for and review Material Safety Data Sheet (MSDS) for detailed safety, health effects spill and disposal information.

DICHLOROBENZENE, para, solid.

UN 1592 RQ 100 lbs/45.4 kgs. ORMA-A

Emergency telephone number (302) 834-4536

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015



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EPA Reg. No. 70305-R *GT*
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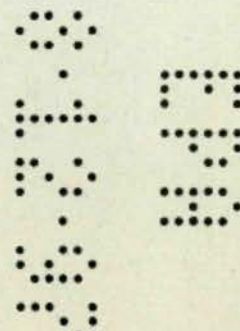
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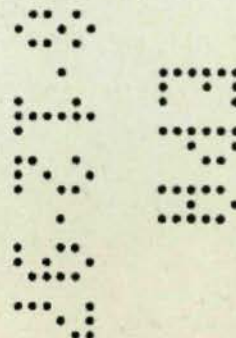
Ask for and review Material Safety Data Sheet (MSDS) for detailed safety, health effects spill and disposal information.

DICHLOROBENZENE, para, solid.

UN 1592 RQ 100 lbs/45.4 kgs. ORMA-A

Emergency telephone number (302) 834-4536

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015



MATERIAL SAFETY DATA SHEET

SECTION 1 - PRODUCT AND COMPANY INFORMATION

Manufacturer: PARAGON HOUSEHOLD PRODUCTS, INC. Chemical Name: 1,4-dichlorobenzene

Address: P.O. Box 2169
Clifton, New Jersey 07015

Telephone: (201) 591-0777

Uses: Moth killer

Deodorizer/air freshener

Trade Name: PARA MOTH BALLS

Emergency telephone: FOR CHEMICAL EMERGENCY, SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT, Day or Night, call CHEMTREC. For calls anywhere in the U.S., Canada, or the Virgin Islands, call toll free to 1-800-424-9300. For calls originating elsewhere, call 1-202-483-7616 (collect calls accepted).

Chemical Formula: $C_6H_4Cl_2$
CAS #: 106-46-7

Chemical Family: Aromatic Chlorohydrocarbon
% by Wt. in Product: 99.4-100%

SECTION 2 - HAZARD STATEMENTS

Warning! This material has been shown to cause irritation to eyes, skin and respiratory tract. Primary exposure routes are skin contact and inhalation. Harmful if swallowed. Keep out of reach of children. Keep away from food. Marine pollutant. Combustible vapor and material. Molten material can cause severe burns. Excessive exposure may cause liver and kidney damage. This material has been shown to cause cancer if administered orally to rodents at high levels.

SECTION 3 - PERSONAL PROTECTION INFORMATION

Skin Protection: Wear appropriate protective clothing including chemical-resistant gloves and impervious boots to prevent skin contact. Use face shield and chemical-resistant clothing such as a rubber apron when splashing is likely. Wash contaminated skin promptly and thoroughly. Launder contaminated clothing and clean protective equipment before re-use.

Eye Protection: Wear chemical safety goggles to prevent eye contact; have emergency eye wash fountains available where eye contact may occur.

Respiratory Protection: Avoid breathing vapor, mist, or dust. Use NIOSH/MSHA-approved respiratory protection equipment (full facepiece recommended) when airborne exposure limits exceeded (see below). If used, full facepiece replaces the need for face shield and/or chemical goggles. Consult respirator manufacturer to determine appropriate type of equipment for given application. Respiratory protection programs must be in compliance with 29 C.F.R. 1910.134.

Airborne Exposure Limits: (for 8-hr TWA) -

- OSHA PEL : 75 ppm
- ACGHA TLV: 10 ppm

Ventilation: Inhalation is one of the primary routes of exposure. Adequate ventilation must be provided to keep the levels of para-Dichlorobenzene vapors below the permissible exposure limits (PEL).

SECTION 4 - FIRST AID INFORMATION

Skin contact: Remove material from skin and clothing. Flush immediately with copious amounts of clean water, remove contaminated clothing, then wash thoroughly with soap and plenty of water for at least 15 minutes. Use safety shower and shampoo if large areas of the body are contaminated. If contact with molten material, treat for thermal effects. The possibility of pesticide sequestered under fingernails or in skin folds should not be overlooked. If irritation and/or discomfort occurs, call physician. **Eye contact:** Remove material from eyes; holding eyelids apart, flush eyes immediately with plenty of water for 15 minutes. Get immediate medical attention. **Inhalation:** Remove exposed person to fresh air. If not breathing, call immediately for medical attention and then proceed to mouth-to-mouth artificial respiration. If breathing is difficult, get medical attention and administer oxygen. **Ingestion:** If material is swallowed, get immediate medical attention. DO NOT INDUCE VOMITING unless directed by medical personnel. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

SECTION 5 - PHYSICAL AND CHEMICAL INFORMATION

NOTE: The information in this Section represent typical values and not specifications.

Appearance: Solid - White/Pink Crystals; Molten - Colorless liquid above 130°F; **Odor:** Penetrating mothball-like odor; **Melting Point:** 53°C (127.4°F); **Boiling Point:** 174°C (345.2°F); **Water Solubility @ 25°C, % by Wt:** 0.008; **Vapor pressure (Air = 1):** 5.1; **Specific Gravity @ 55°/4°C:** Water Partition Coefficient: 3.52.

SECTION 6 - FIRE AND EXPLOSION HAZARD INFORMATION

Flash Point: 65.5°C (150°F) TCC; **Autoignition Temperature:** >1040°F; **Extinguishing Media:** Water spray, foam, CO₂, dry chemical or any class B extinguishing agent; **Stability:** Stable under normal conditions of handling and storage. Avoid strong oxidizers and oxidizing agents, avoid open flames, sparks and hot glowing surfaces. **Hazardous Decomposition:** Smoke, soot, hydrogen chloride, chlorine gas, phosgene, carbon monoxide and carbon dioxide. **Hazardous Polymerization:** Does not occur. **Special Fire Fighting Procedures:** Wear full protective clothing and self-contained breathing apparatus (SCBA) where exposure to toxic gases and/or vapors is possible. Equipment used for extinguishing such fires should be thoroughly decontaminated after use.

SECTION 7 - TRANSPORT/REGULATORY INFORMATION

DOT Shipping Name: p-Dichlorobenzene; **DOT Hazard Class/ID No./Packaging Group:** 6.1/UN 1592/III; **DOT Label Requirements:** KEEP AWAY FROM FOOD, MARINE POLLUTANT; **DOT Emergency Response Guide No.:** 58; **U.S. Surface Freight Classification:** para-Dichlorobenzene; **CERCLA Reportable Quantity (RQ):** 45.4 kg (100 lbs); **Hazard Cat. under SARA Title 311-312 Substances:** Fire, Immediate, Delayed; **SARA Title 313 Toxic Chemicals:** para-Dichlorobenzene is considered a toxic chemical at a concentration of 99.9% (% by Wt.); **TSCA Inventory:** para-Dichlorobenzene is listed in the Inventory of Chemical Substances as published by U.S. EPA; **FIFRA:** This product is registered with the U.S. Environmental Protection Agency; **OSHA Hazard Communication Standards:** para-Dichlorobenzene is identified as a hazardous chemical (29 CFR 1910.1200); **California Proposition 65:** PDCB has been listed in January 1989 as a "chemical known to the State of California to cause cancer", with a No Significant Risk Level of 20 micrograms per day.

SECTION 8 - ACCIDENTAL RELEASE/DISPOSAL INFORMATION

Emergency Spill and Leak: Keep people away and shut off or extinguish all sources of ignition. Small spills, keep upwind. Large spills, evacuate area, dike area, pump liquid material and shovel or sweep up solid material into metal containers, close and properly label containers, store in secure area for reprocessing or disposal. Wear full protective clothing including SCBA if enter the spill area. AVOID CONTAMINATION OF WATER SUPPLIES. Any spill or leak has the potential to cause underground water contamination. Runoff to sewers may create health and pollution hazards - Notify promptly health, fire, and pollution control authorities.

Caution: Any release of 100 lbs or more to the environment in 24-hour period requires immediate notification of the National Response Center (1-800-424-8802) and notification of the State/Local authorities.

Disposal: This product may become a hazardous waste chemical as defined by the U.S. EPA under the authority of RCRA; the RCRA Hazardous Waste Number is U072 as designated by 40 CFR 268. Paragon Household Products recommends material be recovered whenever possible. Shipments of waste materials to sanitary landfills or certified incinerators are subject to manifesting requirements. Disposal by incineration is an approved disposal method and designated Best Available Demonstrated Treatment (BDAT). All Federal, State and Local regulations should be followed in disposing of this material.

SECTION 9 - ECOLOGICAL INFORMATION

Biodegradability: PDCB has been evaluated in a 24-hour semi-continuous activated sludge (SCAS) test and in the Thompson-Duthie-Storm (TDS) biodegradability assay. Primary degradation was > 95% in SCAS test. Theoretical CO₂ evolution was approximately 58% using TDS assay. PDCB was intermediately to readily biodegradable in both assays.

Marine Pollutant: This product is toxic to fish. DO NOT discharge effluent containing PDCB into lakes, rivers, streams, ponds, estuaries, oceans, or public waters. DO NOT discharge effluent to sewer systems without previously notifying the sewage treatment plant authority.

SECTION 10 - TOXICOLOGICAL INFORMATION

The following information summarizes the available scientific reports concerning the toxicology of PDCB. Also considered are the results of short and long-term health effects studies identified in the latest editions of "Clinical Toxicology of Commercial Products," and the "Recognition and Management of Chemical Poisonings".

A - EFFECTS OF ACUTE AND CHRONIC EXPOSURE

Exposure Routes: Inhalation and skin contact are known as the primary exposure routes; however, ingestion may occur accidentally.

Acute Exposure: Vapor concentrations between 30 to 60 ppm may cause minimal eye irritation; higher concentrations may cause severe eye discomfort and/or irritation. PDCB at concentrations of over 75 ppm, may act as a central nervous system depressant. Inhalation of higher PDCB vapor concentrations may cause headache, dizziness, eye, throat and nose irritation, nausea, loss of appetite, vomiting, unconsciousness and even death if inhalation occurs in confined or poorly ventilated area. Several reports indicate that cardiac sensitization leading to ventricular fibrillation may also occur. Solid PDCB is slightly irritating to the skin. Accidental ingestion of large amounts of PDCB may cause effects similar to inhalation. Several disorders, including asthma, respiratory disorders, blood, liver and kidney disorders, may be aggravated by acute exposure to PDCB.

Chronic Exposure: Prolonged skin overexposure to PDCB may cause minor to severe dermatitis depending upon the length of exposure. Oral studies conducted on rats and rabbits indicate that liver and kidney damage may occur. Long-term chronic PDCB inhalation studies conducted on several animal species indicate that liver, lung and kidney damage may also occur. Such chronic overexposure effects have not been confirmed in humans, however, long-term inhalation exposure over the permissible exposure limit (PEL) may potentially result in adverse health effects in humans.

B - TOXICOLOGICAL DATA

Acute Studies: **Vapor Inhalation** - Practically Non-toxic at low vapor concentrations, Category IV (Rat 4-hr LC_{50} > 6.0 mg/l); **Dermal** - Practically Non-toxic, Category IV (Rabbit LD_{50} > 5,010 mg/kg, Rat LD_{50} > 6,000 mg/kg); **Skin Irritation** - Slightly Irritating, Category III (Rabbit 24-hr 1.0 on a scale of 0 to 8); **Eye Irritation** - Slightly Irritating, Category III (Rabbit 4-hr exposure 13.7 on a scale of 0 to 110); **Oral** - Slightly Toxic, Category III (Rat LD_{50} > 3,813 mg/kg);

Chronic Studies: Long-term inhalation studies (14 and 28 weeks) conducted on rabbits, rats, guinea pigs and dogs, resulted in liver, kidney and lung damage, reduced body weights, reduced number of white blood cells, reversible eye changes (rabbits and rats only), and animal deaths at high PDCB exposure levels. No adverse effects were noted in rabbits and rats following repeated skin exposure (3, 6, and 9 weeks) to PDCB. Long-term oral dosing studies (4 to 13 weeks) conducted on rabbits and rats indicated changes in body weight, liver and kidney damage; the degree of damage was a function of the PDCB dosage administered. Changes in bone marrow, spleen, thymus and nasal turbinates were also observed in rats, but only at high dosages.

Reproductive Toxicity: Teratogenic studies indicate that PDCB administered orally to parental rats and rabbits did not induce any teratogenic effect in the offsprings. Exposure of pregnant rats and rabbits to PDCB in inhalation studies produced no increase in teratogenic, embryotoxic or fetotoxic effects or in treatment-related birth defects. No effects were noted on the ability of rats and rabbits to reproduce when exposed to PDCB by inhalation for 2 successive generations. Reductions in body weight of female rats and rabbits and reductions of pup survival were reported by several inhalation studies using high vapor concentrations of PDCB.

Genetic Toxicity: Generally, PDCB has produced no mutagenic or genotoxic responses in microbial cells assays; similar results were reported in studies conducted on rat bone marrow cells, hamster ovary cells, mice red blood cells, and no chromosomal aberrations were reported by DNA studies on cultured human lymphocytes. PDCB was found to bind to nucleic acids in mice studies, but not in rat studies. PDCB and/or its major metabolite (2,5-dichlorophenol) has been found to bind with alpha-2 micro-globulin, a protein unique to male rat kidney. Several short-term studies conducted on male rats, reported that exposure to PDCB resulted in increased cell replication rate in male population.

C - CARCINOGENICITY DATA

Short-term PDCB Inhalation studies in which rabbits, rats, and guinea pigs were exposed to <100 mg/l of air for 20-30 minutes per day for up to 34 exposures, reported extensive kidney damage and slight liver damage, but no oncogenic effects. Long-term inhalation studies conducted on mice and rats indicated that exposure for 57 to 76 weeks at various PDCB vapor concentrations did not result in any treatment-related oncogenic effects; liver and kidney weights were increased, but only at the highest PDCB concentrations (>500 ppm level). Short-term studies of orally administered PDCB resulted in tumors of the kidney of male rats only. It was indicated that this increase in kidney tumors was determined by a special cell-proliferation mechanism, unique to the male rat. Long-term (2 years) studies of the effects of PDCB administered by gavage to mice and rats resulted in tumors of the kidney (male rat) and liver (male and female mice), associated with body weight losses and death at high doses of PDCB. In other long-term studies (7 to 9 months) in which rabbits were administered various doses of PDCB by intubation, it was reported an increase in mortality, weight loss, tremors, and histological liver damage at 1,000 mg/kg/day, and similar liver damage only at 500 mg/kg/day; however, no tumors were noted.

Summarizing the carcinogenicity studies available, the National Toxicology Program (NTP) listed PDCB in their 1995 Annual Report on Carcinogens as a substance that may "be reasonably anticipated to be carcinogenic". The International Agency for Research on Cancer (IARC) recently classified PDCB as "possibly carcinogenic to humans" (IARC Monographs, Vol. 31.175). The NTP and IARC classification of PDCB as "possible carcinogen" was based on their determination that there was not sufficient scientific evidence for the PDCB's carcinogenicity for humans. While many carcinogenicity studies reported tumors in male rats and liver tumors in male and female mice, these studies also demonstrated that these findings have only a minimal relevance to humans.

Based upon a comprehensive review of the available health effects studies of PDCB, many regulatory and advisory organizations, nationally and world-wide, such as the U.S. Environmental Protection Agency (EPA), the U.S. Consumer Product Safety Commission (CPSC) and the World Health Organization (WHO), have reached the conclusion that PDCB can not be properly classified as a "probable human carcinogen". Therefore, EPA rejected a proposal to classify PDCB as "probable human carcinogen" and decided that the less restrictive "possible human carcinogen" classification was warranted. Para-Dichlorobenzene was also listed as a "possible human carcinogen" under the California Safe Drinking Water and Toxic Substances Enforcement Act of 1986 (California Proposition 65).

ALTHOUGH THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE PRESENTED IN GOOD FAITH AND BELIEVED TO BE CORRECT AS TO THE DATE HEREOF, PARAGON HOUSEHOLD PRODUCTS INC. MAKES NO REPRESENTATIONS AS TO THE COMPLETENESS OR ACCURACY THEREOF. INFORMATION IS SUPPLIED UPON THE CONDITION THAT THE PERSONS RECEIVING THIS MSDS WILL MAKE THEIR OWN DETERMINATION AS TO ITS SUITABILITY FOR THEIR PURPOSES PRIOR TO USE. IN NO EVENT WILL PARAGON HOUSEHOLD PRODUCTS INC. BE RESPONSIBLE FOR DAMAGES OF ANY NATURE WHATSOEVER RESULTING FROM THE USE OF OR RELIANCE UPON INFORMATION. NO REPRESENTATIONS OR WARRANTIES, EITHER EXPRESSED OR IMPLIED, OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR OF ANY OTHER NATURE ARE MADE HEREUNDER WITH RESPECT TO INFORMATION ON THE PRODUCT TO WHICH INFORMATION REFERS.

Prepared By: ENVIROCON INTL INC.

Date: January 31, 1997

FH

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (201) 591-0777
Fax: (201) 591-0770

CERTIFIED MAIL
RETURN RECEIPT REQUIRED

U.S. EPA
Front End Processing Staff
Information Services Branch
Program Management and Support Division
401 M. Street, S.W.
Washington, D.C. 20460

RE: Application for a New Me-Too Registration
EPA File Symbol 70305-R, OPP ID #258235

G

August 5, 1997

Dear Sir/Madam:

This is regarding the application for "Me-Too" registration of our product "PARA MOTH FLAKES".

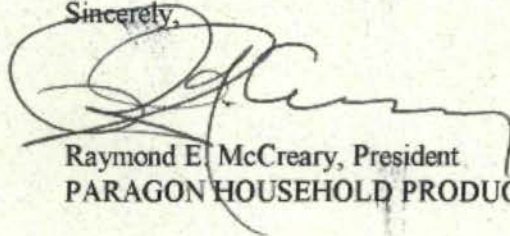
Please find enclosed the following:

- Application for Pesticide Registration, EPA Form 8570-1;
- Confidential Statement of Formula, EPA Form 8570-4;
- Formulator's Exemption, EPA Form 8570-27;
- Certification with Respect to Citation of Data, EPA Form 8570-29;
- 5 copies of proposed labeling;
- additional information (MSDS)

We advise you that we will be only repackaging the paradichlorobenzene supplied by [REDACTED]

We trust that our application will pass the administrative screen for completeness and it will be forwarded to Registration Division Team 32 for an Expedited Review.

Sincerely,


Raymond E. McCreary, President
PARAGON HOUSEHOLD PRODUCTS, INC.

Enclosures

Product ingredient source information may be entitled to confidential treatment

Material Sent for Data Extraction

Reg # 70305-3

Description: Reg 15/2/14

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 5-2-14

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other _____

☐ Decision # _____

Other Action/Comments:

Please scan clipped items – Thank you!

Reviewer: Gene Benbow

Phone: 347-0235 Division: RD - IRB

Date: 5-5-14



**U.S. ENVIRONMENTAL
PROTECTION AGENCY**
Office of Pesticide Programs
Registration Division (7504P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg.

70305-3

Date of
Issuance:

MAY 2 2014

NOTICE OF PESTICIDE:

☐ Registration
☒ Reregistration
(under FIFRA, as amended)

Terms of Issuance:
Unconditional

Name of Pesticide Product:
Paragon Moth Flakes

Paragon Household Products
c/o
Matthew Brooks
Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

EPA grants this reregistration under the authority of section 3(c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). With this accepted labeling, all requirements set forth in the Reregistration Eligibility Decision for **Paradichlorobenzene** have been satisfied. Therefore, EPA reregisters the product listed above. This action is taken under the authority of section 4(g)(2)(c) of FIFRA, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Confidential Statement of Formula

The acceptable Confidential Statement of Formula (CSF) on record for this product is:

1 Basic CSF - dated 10/31/13

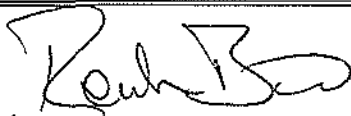
Any previously dated CSFs are superseded.

(next page)

Existing Stocks Provisions

Stocks of product with existing labels may be used for 12 months. A copy of your label stamped "Accepted" is enclosed for your records. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions regarding this label, please contact Gene Benbow at (703) 347-0235 or via email at benbow.gene@epa.gov.

Reuben Baris
Acting Product Manager 07
Insecticide-Rodenticide Branch
Registration Division



05/22/2014

Front Panel

Paragon Moth Flakes

KILLS MOTHS AND CARPET BEETLES

NET WT.10 oz (283.5g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

OTHER INGREDIENTS:..... 0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3

EPA Est. No.

Left and Right Side Panels

PARA MOTH FLAKES

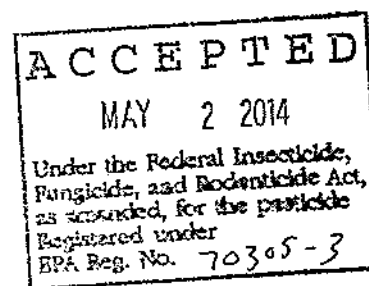
KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

HBC CHEMICAL LLC.

324A HALF ACRE RD

CRANBERRY, NJ 08512



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Wear protective eyewear. Harmful if swallowed or inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

Physical or Chemical Hazards

Combustible: Do not use or store near heat or open flame

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

| FIRST AID | |
|--|---|
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. |
| IF SWALLOWED: | Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. |
| IF ON SKIN OR CLOTHING: | Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. |
| IF INHALED: | Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222. | |

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container, in a cool dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Nonrefillable Container. Do not reuse or refill container.

If Empty: Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

HBC CHEMICAL LLC,
324A HALF ACRE RD
CRANBERRY, NJ 08512

DATA PACKAGE BEAN SHEET

Date: 24-Apr-2014

Page 1 of 1

Decision #: 425800

DP #: (419719)

NON PRIA

Parent DP #:

Submission #: 884907

E-Sub #:

PM

*** Registration Information ***

Registration: 70305-3 - PARAGON MOTH FLAKES

Company: 70305 - HBC CHEMICAL, LLC

Risk Manager: RM 07 - Reuben Baris - (703) 305-7356 Room# PYt S-7227

Risk Manager Reviewer: Veronica Dutch VDUTCH

Sent Date: 02-Nov-2010

PRIA Due Date: 01-Nov-2010

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (676) Product Reregistration Decision;

Ingredients: 06150 t, Paradichlorobenzene(99.9%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 24-Apr-2014

Due Back: _____

DP Ingredient: 06150 t, Paradichlorobenzene

DP Title: Final Reregistration P-Dichlorobenz Reg# 70305-3

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP tt:

Assigned To

Date In

Date Out

Organization: RD / IRB

Last Possible Science Due Date: _____

Team Name: _____

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

Recommended for completed reregistration for p-Dichlorobenzene RED. Please close out this data package after your final review of the label. All reviews, CSF and label are included. Should you have any questions, please Veronica Dutch at 703-308-8585. Thank you.

Date: April 8, 2014

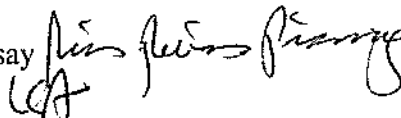
Reg. No.: 70305-3

Product Name: Paragon Moth Flakes

PM Name/Number: Reuben Baris, RD Risk Management Team 7

Primary Reviewer: Maria Rivera Piansay

Secondary Reviewer: Linda Arrington



New label or date of RD amended label: 08/11/11

Active Ingredient(s) Assessed: Paradichlorobenzene/061501

Formulation Type: Crystalline

Notes to PM:

- 1) RD should ensure that the Storage and Disposal section complies with PR Notice 2007-4.
- 2) PRD's acute toxicity review does not require any Note to Physician statement (currently appearing below the First Aid section) and defers to RD whether this statement should be left on the label. Further, PRD defers to RD the need for the statement "Causes eye, skin, and respiratory tract irritation" currently appearing under the Hazards to Humans and Domestic Animals section.

Assessment can be found N:\RMIBV\label\070305\003

- 1) Per the acute toxicity review, First Aid statements must be placed in the following order based on toxicity ranking:

IF IN EYES...
IF SWALLOWED...
IF ON SKIN OR CLOTHING...
IF INHALED...

- 2) The Hazards to Humans and Domestic Animals section must be revised to read (words in bold are additions or revisions):

"Causes substantial but temporary eye injury. Harmful if swallowed **or inhaled**. Avoid contact with eyes, skin, or clothing. Avoid breathing (dust, vapor, or spray mist). Wear (specify **appropriate protective eyewear** such as goggles, face shield **or safety glasses** and any **appropriate clothing and gloves, if appropriate**). Wash thoroughly with soap and water after handling and **before eating, drinking, chewing gum, using tobacco or using the toilet**. Remove contaminated clothing and wash before reuse.

3) A Physical or Chemical Hazards subheading and the following text must be added to the label: "Combustible. Do not use or store near heat or open flame."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM:

Date: 03/07/2014
Subject: Paragon Moth Flakes
PC Code: 061501
EPA Reg. No.: 70305-3
Document Type: Acute Toxicity Review
MRID Nos.: 405210-01, 414109-01, 422053-01,-02,-03.

DP Barcode: 418001
Case No.: 0649
CAS No.: 106-46-7
40 CFR: 158.500

From: Boris Yurchak, Chemist *BYu*
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Thru: Shirley Keel, Acting Team Leader *Shirley Keel*
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

To: Veronica Dutch, CRM
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Applicant: Paragon Household Products, Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

FORMULATION FROM EPA Reg. No. 70305-3 LABEL:

Active Ingredient(s): _____ % by wt.

Active Ingredient(s):

Paradichlorobenzene..... 99.9%

Other Ingredient(s): 0.1%

Total 100.0%

TXR = 4002726

BACKGROUND: In their 8 month response to Para-Dichlorobenzene RED, the registrant is citing 6 acute toxicity studies to support the reregistration of their product Paragon Moth Flakes, EPA Reg. No. **70305-3**. The MRID's are as follows: 405210-01 (81-1, 81-2), 414109-01 (81-3), 422053-01 (81-4), 422053-02 (81-5) and 422053-03 (81-6). Acute oral and acute dermal studies (81-1 and 81-2) were conducted by US EPA Health Effects Research Laboratory, RTP, NC. Acute inhalation (81-3) was conducted by Bio/dynamics, Inc.; primary eye (81-4), primary dermal (81-5) and dermal sensitization (81-6) studies were conducted by Hill Top Biolabs, Inc.

The test materials used in the studies cited are provided in the table below:

| Guideline # | MRID | Test material |
|-------------|-----------|---|
| 81-1 | 405210-01 | Para-Dichlorobenzene (1,4-Dichlorobenzene) |
| 81-2 | idem | idem |
| 81-3 | 414109-01 | Para-Dichlorobenzene (100% Active ingredient) |
| 81-4 | 422053-01 | Para-Dichlorobenzene (Purity 99.97%) |
| 81-5 | 422053-02 | idem |
| 81-6 | 422053-03 | idem |

These studies were reviewed by RMIB-V on 05/03/2012 (B.C. Gregg, D401428) for the product MothGuard Old Fashioned Moth Balls, EPA Reg. No. 51311-3, which contains 99.75% Paradichlorobenzene and found acceptable.

The current reviewer concurs with RMIB-V concerning the proposed acute toxicity profile for Reg. No. 70305-3. The Toxicity Categories were extracted from the acute toxicity review of EPA Reg. No. 51311-3 (05/03/2012, D401428); however the label language must be modified to comply with this review.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. **70305-3**.

The acute toxicity profile for EPA Reg. No. **70305-3** is currently:

| | | |
|--------------------|------------------|---|
| Acute Oral | III | Cited (LD ₅₀ =3863/3790 mg/kg (males/females)) |
| Acute Dermal | IV | Cited (LD ₅₀ > 6000 mg/kg. males&females) |
| Acute Inhalation | III | Cited (Waived) |
| Primary Eye | II | Cited |
| Primary Dermal | III | Cited |
| Skin Sensitization | Not a sensitizer | Cited |

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 070305-00003 Paragon Moth Flakes

SIGNAL WORD: **WARNING**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Causes substantial but temporary eye injury. Harmful if swallowed. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing (dust, vapor or spray mist). Wear (specify appropriate protective eyewear such as goggles, face shield, or safety glasses, and any appropriate protective clothing and gloves, if appropriate). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

DATE OUT: 3/7/2014

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI[]; MUP []; EUP [X]
BARCODE NO.: 418025 REG./FILE SYMBOL NO.: 70305-3
PRODUCT NAME: Paragon Moth Flakes MRID NO: 485446-01 and 485447-01
COMPANY NAME: HBC Chemicals, LLC ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

THROUGH: Shirley Keel, Acting Team Leader
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Revised Reregistration Eligibility Decision (Revised RED), Case No. 3058, was issued on 12/09/2008 for the Active Ingredient Para-dichlorobenzene a.k.a. PDCB. According to the RED, the generic database supporting the reregistration of Para-dichlorobenzene for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Para-dichlorobenzene RED, HBC Chemicals, LLC provided EPA Form 8570-4 (Confidential Statement of Formula), a basic formulation, dated 02/07/2011; a draft label, dated 11/01/2010; RD decision No. 446751, dated 07/18/2011, DP barcode 391871; and MRID No. 485446-01 and 485447-01. The registrant is requesting reregistration of the product, Paragon Moth Flakes, EPA Reg. No. 70305-3.

FINDINGS:

1. EPA Reg. No. 70305-3 is an end-use product containing the active ingredient Para-dichlorobenzene (1,4-dichlorobenzene), with a label claim nominal concentration of 99.9%, and other ingredients content of 0.1%. The product is for use in killing moth and carpet beetles. The product is produced by a non-integrated system.
2. Review of CSF and other available information indicates that the subject product is identical to the product with Reg. No. 51311-3 (RD decision No. 446751, dated 07/18/2011). Therefore, the registrant may rely on the product chemistry data from Reg. No. 51311-3 (PC review dated 02/16/2012, DP barcode 398654, to fulfill its product chemistry requirements.
3. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2, 97-5, and 97-6. Physical or Chemical Hazards section must be added to the label, including statements as follows: "Combustible. Do not use or store near heat or open flame." The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

Note to PM: Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 70305-3.

~~—THIS REVIEW CONTAINS FIFRA CBI—~~

DP BARCODE No.: 391871

EPA Reg. No.: 70305-3

DECISION No.: 446751

PC Code(s): 061501

ACTION CODE: 340

FOOD Use: No

NON-FOOD Use: No

DATE: July 18, 2011

SUBJECT: Product Name: Para Motli Flakes

FROM: Akiva Abramovitch, Ph. D.
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

TO: Daniel Peacock/John Hebert, PM 7
Insecticide-Rodenticide Branch / Registration Division (7505P)

Company Name: Paragon Household Products.

Formulation Type: Solid

INTRODUCTION:

The applicant petitioned to replace the previously accepted basic CSF dated 1/13/06 with this basic CSF dated 2/7/10 which uses an unregistered source of para-dichlorobenzene from [REDACTED]. The registrant claims that the [REDACTED] is also the source of para-dichlorobenzene used by HBC Chemicals, EPA Reg. No. 51311-3.

SUMMARY OF FINDINGS:

The product chemistry data for the HBC identical product was provided in MRID 473923-01 to support the registration of their product. The data was reviewed in DP 352262 for the registration and in DP 386506 for the re-registration of EPA reg. No. 51311-3.

CONCLUSIONS:

TRB has concluded that the registrant can rely on the data from HBC chemicals to support the registration of their product. The PM should ask for an authorization letter from HBC allowing Paragon to use their data. The Basic CSF dated 2/7/10 will supersede the previously accepted Basic CSF currently on file.

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

AUG 11 2011

Attention: Dr. Matthew Brooks

Subject **Paragon Moth Flakes**
 EPA Reg. No. 70305-3
 Amendment to Change Confidential Statement of Formula (CSF)
 and to Revise Label
 Your application of February 8, 2011
 Your resubmission of August 10, 2011

Purpose The purpose of this submission is to revise your CSF and label for this product, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

CSF You have submitted a new CSF (Basic Formulation), dated February 7, 2011, and citations for data supporting a new basic, unregistered source of active ingredient. We have reviewed and found the data acceptable. A copy of your new CSF (Basic Formulation), February 7, 2011, has been placed in our previous versions are obsolete.

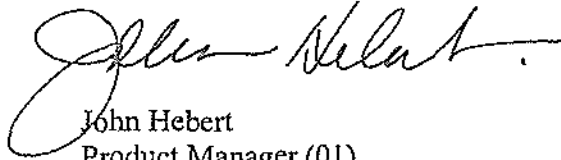
Labeling The labeling submitted with your resubmission of August 10, 2011, is acceptable, provided you submit one (1) copy of final printed labeling to us, before you ship your product.

Existing stocks Stocks of product with existing labels may be used for eighteen (18) months.

Questions

If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Hebert", with a large, stylized initial "J" and a horizontal line extending to the right.

John Hebert
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Front Panel

070305-00003.20110810a

PARAGON
HOUSEHOLD PRODUCTS INC.

Paragon Moth Flakes

ACCEPTED AUG 11 2011

KILLS MOTHS AND CARPET BEETLES

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

ACTIVE INGREDIENT:

Paradichlorobenzene.....EPA Reg. No. 70305-3.....99.9%

OTHER INGREDIENTS:.....0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
WARNING
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3
EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

PARA MOTH FLAKES

KILLS MOTHS AND CARPET BEETLES

FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512

70305-3

8/11/2011

1045

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Decision # 446751
R340 5-901345
1155

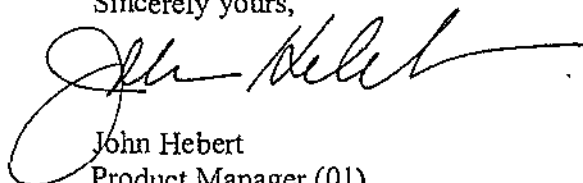
AUG 11 2011

Attention: Dr. Matthew Brooks

| | |
|-----------------|---|
| Subject | Paragon Moth Flakes EPA Reg. No. 70305-3 Amendment to Change Confidential Statement of Formula (CSF) and to Revise Label Your application of February 8, 2011 Your resubmission of August 10, 2011 |
| Purpose | The purpose of this submission is to revise your CSF and label for this product, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). |
| CSF | You have submitted a new CSF (Basic Formulation), dated February 7, 2011, and citations for data supporting a new basic, unregistered source of active ingredient. We have reviewed and found the data acceptable. A copy of your new CSF (Basic Formulation), February 7, 2011, has been placed in our previous versions are obsolete. |
| Labeling | The labeling submitted with your resubmission of August 10, 2011, is acceptable, provided you submit one (1) copy of final printed labeling to us, before you ship your product. |
| Existing stocks | Stocks of product with existing labels may be used for eighteen (18) months. |

Questions If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,



John Hebert
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Location Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash Drive\PDB\Registration Activities\70305-3\70305-3, Rev CSF, new basic source, gen label rev, 8-10-2011, ver 3.doc

3045

Front Panel

070305-00003.20110810a

PARAGON
HOUSEHOLD PRODUCTS INC..

Paragon Moth Flakes

ACCEPTED
KILLS MOTHS AND CARPET BEETLES AUG 11 2011

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

EPA. Reg. No: 70305-3

OTHER INGREDIENTS:.....0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
WARNING
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3
EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

PARA MOTH FLAKES

KILLS MOTHS AND CARPET BEETLES

FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512

Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

| FIRST AID | |
|--|---|
| IF SWALLOWED: | Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. |
| IF ON SKIN OR CLOTHING: | Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. |
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. |
| IF INHALED: | Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222. | |

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container, in a cool dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Nonrefillable Container. Do not reuse or refill container.

If Empty: Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512

PRODUCT REREGISTRATION

SUPPORTING DOCUMENTATION

FOR

Chemical Name: p-Dichlorobenzene

Reg. No. 70305-3

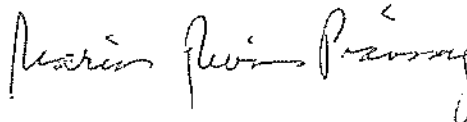
This supporting documentation (in chronological order) includes:

- ☐ Old labels (identified as "Superseded by label dated xx/xx/xx")
- ☐ Unacceptable CSFs (marked "Not Acceptable" and dated)
- ☒ Product chemistry reviews
- ☒ Acute Toxicity reviews
- ☐ Efficacy reviews (if necessary)
- ☒ 90-day responses to PDCI (Form A and Form B)
- ☒ Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- ☒ Correspondence

DATE OUT: 16/FEB/2012

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [I]; MUP [I]; EUP [X]
BARCODE NO.: D398654 REG./FILE SYMBOL NO.: 51311-3
PRODUCT NAME: MothGuard Old Fashioned Moth Balls MRID NOS.: 485447-01, 485446-01
COMPANY NAME: HBC Chemical Company ACTION CODE: 676

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
Risk Management and Implementation Branch
Pesticide Re-evaluation Division (7508P)



TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

With this resubmission, in response to our review dated 5/12/11, HBC Chemical Company provided additional product chemistry data pertaining to the Storage Stability, Corrosion Characteristics, and UV/Visible Absorption of the product. The registrant is requesting reregistration of their product, MothGuard Old Fashioned Moth Balls, EPA Reg. No. 51311-3.

FINDINGS:

1. EPA Reg. No. 51311-3 is an end-use insecticide, containing the active ingredient, p-Dichlorobenzene (PDCB), with a label claim nominal concentration of 99.75%. The product is an insecticide for use in killing carpet beetles and moths and their eggs and larvae. The product is for use in clean, airtight containers (e.g., chests, trunks, garment bags) and storage closets. The product is produced by an integrated system.
2. The storage stability test (MRID number 485447-01) was conducted in the original plastic sealed bags inside cardboard boxes. Eleven containers of the test substance were put into storage for one year at ambient laboratory conditions following initial characterization of the active ingredient. The level of active ingredient was determined by Gas Chromatography (GC) at 0, 3, 6, 9, and 12 months. A reference standard was used to quantitate the active ingredient concentration of the test substance. Linearity, precision, and spike recovery were performed to ensure method performance. A one-time screen for benzene hexachloride at a LOD of 0.1 ppm was performed. A detailed description of the analytical test methods was documented at the time of initial characterization. At the end of each storage phase, the appearance of the product and container was observed and recorded. The test substance was in contact with the storage container throughout the storage period.

Prior to storage, the original containers holding the test substance were weighed and the weights recorded. At the end of each test period, the containers were reweighed and the weight recorded. The change in weight of each container was determined.

Results:

| Test Substance | Initial | 3-month | 6-month | 9-month | 13-month |
|------------------------------------|--|---------|---------|---------|----------|
| Moth balls (PARA), Code: MG5 | % Para-dichlorobenzene (Mean) | | | | |
| | 97.39 | 97.62 | 99.53 | 98.44 | 99.69 |
| | % Benzene hexachloride (Mean Impurity) | | | | |
| | None Detected | | | | |

The test substance was found to retain its level of active ingredients when stored at ambient temperature for 13 months. Benzene hexachloride (an impurity of toxicological concern) was not detected in the sample at an LOD of 0.1 ppm. No significant weight change and no change in physical appearance of the test substance were observed. No corrosion of the storage container was observed.

The submitted studies are acceptable. The requirements concerning Guideline 830.6317 (Storage Stability) and Guideline 830.6320 (Corrosion Characteristics) are now satisfied.

3. The UV/Vis spectra and molar absorptivity constant for p-dichlorobenzene were measured and as presented in MRID number 485446-01. The UV/Vis spectra of p-dichlorobenzene provided were referenced in the report. The UV spectra were originally conducted by Hooker Chemical in Niagara Falls. Both target analyte and blank cuvette spectra were pictured.

P-Dichlorobenzene showed no absorbance in the visible spectra (380-750 nm). Maximum absorptivity was shown at 224nm.

The study is acceptable. The requirements concerning Guideline 830.7050 (UV/Visible Absorption) are now satisfied.

4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2 and 97-6. The Physical or Chemical Hazards Statement on the draft label is acceptable. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

[Note to Label Reviewer: The following revisions to the label are recommended: (a) place the Storage and Disposal Statements in a text box for prominence; (b) under the Storage and Disposal Statements, change the Storage subheading to read "Pesticide Storage;" and (c) under the Storage and Disposal Statements, change the Disposal subheading to read "Pesticide Disposal and Container Handling."]

CONCLUSIONS:

The registrant has now satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 51311-3.

DATE OUT: 3/7/2014

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI[]; MUP []; EUP [X]
BARCODE NO.: 418025 REG./FILE SYMBOL NO.: 70305-3
PRODUCT NAME: Paragon Moth Flakes MRID NO: 485446-01 and 485447-01
COMPANY NAME: HBC Chemicals, LLC ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

THROUGH: Shirley Keel, Acting Team Leader
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Revised Reregistration Eligibility Decision (Revised RED), Case No. 3058, was issued on 12/09/2008 for the Active Ingredient Para-dichlorobenzene a.k.a. PDCB. According to the RED, the generic database supporting the reregistration of Para-dichlorobenzene for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Para-dichlorobenzene RED, HBC Chemicals, LLC provided EPA Form 8570-4 (Confidential Statement of Formula), a basic formulation, dated 02/07/2011; a draft label, dated 11/01/2010; RD decision No. 446751, dated 07/18/2011, DP barcode 391871; and MRID No. 485446-01 and 485447-01. The registrant is requesting reregistration of the product, Paragon Moth Flakes, EPA Reg. No. 70305-3.

FINDINGS:

1. EPA Reg. No. 70305-3 is an end-use product containing the active ingredient Para-dichlorobenzene (1,4-dichlorobenzene), with a label claim nominal concentration of 99.9%, and other ingredients content of 0.1%. The product is for use in killing moth and carpet beetles. The product is produced by a non-integrated system.
2. Review of CSF and other available information indicates that the subject product is identical to the product with Reg. No. 51311-3 (RD decision No. 446751, dated 07/18/2011). Therefore, the registrant may rely on the product chemistry data from Reg. No. 51311-3 (PC review dated 02/16/2012, DP barcode 398654, to fulfill its product chemistry requirements.
3. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2, 97-5, and 97-6. Physical or Chemical Hazards section must be added to the label, including statements as follows: "Combustible. Do not use or store near heat or open flame." The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

Note to PM: Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 70305-3.

~~THIS REVIEW CONTAINS FIFRA CBI~~



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM:

Date: 03/07/2014
Subject: Paragon Moth Flakes
PC Code: 061501
EPA Reg. No.: 70305-3
Document Type: Acute Toxicity Review
MRID Nos.: 405210-01, 414109-01, 422053-01,-02,-03.

DP Barcode: 418001
Case No.: 0649
CAS No.: 106-46-7
40 CFR: 158.500

From: Boris Yurchak, Chemist *BYu*
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Thru: Shirley Keel, Acting Team Leader *Shirley Keel*
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

To: Veronica Dutch, CRM
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Applicant: Paragon Household Products, Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

FORMULATION FROM EPA Reg. No. 70305-3 LABEL:

| Active Ingredient(s): | % by wt. |
|----------------------------|----------|
| Active Ingredient(s): | |
| Paradichlorobenzene..... | 99.9% |
| Other Ingredient(s): | 0.1% |
| Total | 100.0% |

BACKGROUND: In their 8 month response to Para-Dichlorobenzene RED, the registrant is citing 6 acute toxicity studies to support the reregistration of their product Paragon Moth Flakes, EPA Reg. No. **70305-3**. The MRID's are as follows: 405210-01 (81-1, 81-2), 414109-01 (81-3), 422053-01 (81-4), 422053-02 (81-5) and 422053-03 (81-6). Acute oral and acute dermal studies (81-1 and 81-2) were conducted by US EPA Health Effects Research Laboratory, RTP, NC. Acute inhalation (81-3) was conducted by Bio/dynamics, Inc.; primary eye (81-4), primary dermal (81-5) and dermal sensitization (81-6) studies were conducted by Hill Top Biolabs, Inc.

The test materials used in the studies cited are provided in the table below:

| Guideline # | MRID | Test material |
|-------------|-----------|---|
| 81-1 | 405210-01 | Para-Dichlorobenzene (1,4-Dicldorobenzene) |
| 81-2 | idem | idem |
| 81-3 | 414109-01 | Para-Dichlorobenzene (100% Active ingredient) |
| 81-4 | 422053-01 | Para-Dichlorobenzene (Purity 99.97%) |
| 81-5 | 422053-02 | idem |
| 81-6 | 422053-03 | idem |

These studies were reviewed by RMIB-V on 05/03/2012 (B.C. Gregg, D401428) for the product MothGuard Old Fashioned Moth Balls, EPA Reg. No. 51311-3, which contains 99.75% Paradichlorobenzene and found acceptable.

The current reviewer concurs with RMIB-V concerning the proposed acute toxicity profile for Reg. No. 70305-3. The Toxicity Categories were extracted from the acute toxicity review of EPA Reg. No. 51311-3 (05/03/2012, D401428); however the label language must be modified to comply with this review.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. **70305-3**.

The acute toxicity profile for EPA Reg. No. **70305-3** is currently:

| | | |
|--------------------|------------------|---|
| Acute Oral | III | Cited (LD ₅₀ =3863/3790 mg/kg (males/females)) |
| Acute Dermal | IV | Cited (LD ₅₀ > 6000 mg/kg. males&females) |
| Acute Inhalation | III | Cited (Waived) |
| Primary Eye | II | Cited |
| Primary Dermal | III | Cited |
| Skin Sensitization | Not a sensitizer | Cited |

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 070305-00003 Paragon Moth Flakes

SIGNAL WORD: **WARNING**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Causes substantial but temporary eye injury. Harmful if swallowed. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing (dust, vapor or spray mist). Wear (specify appropriate protective eyewear such as goggles, face shield, or safety glasses, and any appropriate protective clothing and gloves, if appropriate). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

FIRST AID:

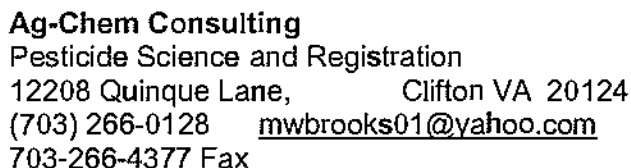
IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.



Para Dichlaa benzoni

To: Veronica Dutch
Chemical Review Manager
Regulatory Management Branch II
Pesticide Re-Evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501

**Subject: ReRegistration of Paragon Moth Flakes EPA Reg# 70305-3
8 Month Response**

Ag-Chem Consulting, on behalf of Paragon Household Products, hereby submits the following 8 month response for the above product.

An Application;

Two copies of the Confidential Statements of Formula. This product consists of 100% active ingredient and uses 100% of another registered product. The product listed in this CSF has been recently cancelled. We have submitted an amendment to RD changing to another registered source of active ingredient.

A Data Citation Certification Form:

A Formulator's Exemption Form

A Completed Data Matrix listing the data submitters. Our product consists entirely of a previously registered product

Five Copies of draft labeling revised as requested in the RED.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

Very Sincerely,

Matthew Brooks
Director, Ag-Chem Consulting LLC
An authorized representative for Paragon Household Products

[illegible]

57
NOV 7 1967




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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

| | | | | | |
|---|----------------------|---------------------------------|--|-------------|------------------|
| Date 10-29-10 | | EPA Reg No./File Symbol 70305-3 | | Page 4 of 4 | |
| Applicant's/Registrant's Name & Address Paragon Household Products, c/o Ag-Chem Consulting, 12208 Quince Lane, Clifton, VA 20124 | | Product Paragon Moth Flakes | | | |
| Ingredient p-Dichlorobenzene | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | IMS Trading, LLC | | |
| | | | 6010 West Wilshire Blvd, #400 | | |
| | | | Los Angeles, CA 90038 | | |
| | | | | | |
| | | | Oxford & Hill Home Products, LLC | | |
| | | | 2800 Biscayne Blvd, Suite 500 | | |
| | | | Miami, FL 33137 | | |
| | | | | | |
| | | | Jiangsu Yangnong Chemical Group Co. | | |
| | | | Valdosta, GA 31603 | | |
| | | | | | |
| | | | | | |
| Signature  | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number Paragon Household Products Inc. / 70305-3 | 2. EPA Product Manager John Hebert | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product Name Paragon Household Products Inc. / PARA MOTH FLAKES | PM# 19 | |
| 5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input checked="" type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|---|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Find printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input checked="" type="checkbox"/> Other - Explain below. |

Explanation: Use additional pages if necessary. (For section I and Section II.)

8 Month Reregistration response

Section - III

| | | | |
|--|--|---|--|
| 1. Material This Product Will Be Packaged In: | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) plastic bag in box |
| * Certification must be submitted | | II "Yes" Unit Packaging wgt. 2-24 oz | No. per container 6-12 |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 10 oz. | 5. Location of Label Directions <input checked="" type="checkbox"/> printed on box |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled | | <input type="checkbox"/> Other _____ | |

Section - IV

| | | | |
|---|---------------------------------------|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Dr. Matthew Brooks | Title Director, Ag-Chem Consulting | Telephone No. (Include Area Code) 703-266-0128 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamped) |
| 2. Signature | 3. Title Regulatory Consultant | | |
| 4. Typed Name Matthew Brooks | 5. Date 10/25/10 | | |

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WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

| | |
|---|--|
| Applicant's/Registrant's Name, Address, and Telephone Number Paragon Products c/o Ag-Chem Consulting 12208 Quince Lane Clifton VA 20124 703-266-0128 | EPA Registration Number/File Symbol 70305-3 |
| Active Ingredient(s) and/or representative test compounds p-Dichlorobenzene | Date 10/29/2009 |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor, nonfood | Product Name Para Molh Flakes |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

10/29/2009

Typed or Printed Name and Title

Matthew Brooks, Regulatory Consultant




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401 M Street, S.W.
WASHINGTON, D.C. 20460

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| Applicant's/Registrant's Name & Address Paragon Household Products, c/o Ag-Chem Consulting, 12208 Quince Lane, Clifton, VA 20124 | | Product Paragon Moth Flakes | | | |
| Ingredient p-Dichlorobenzene | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | Any required generic data | | Syngenta Crop Protection | | |
| | | | Greensboro, NC 27419 | | |
| | | | | | |
| | | | Spray Drift Task Force | | |
| | | | 1900 K St, NW | | |
| | | | Washington, DC 20006 | | |
| | | | | | |
| | | | Agricultural Reentry Task Force | | |
| | | | 1350 I Street, NW | | |
| | | | Washington, DC 20005 | | |
| | | | | | |
| | | | FIFRA Endangered Species Task Force | | |
| | | | 1350 I Street, NW | | |
| | | | Washington, DC 20005 | | |
| | | | | | |
| Signature  | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |



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| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Notes |
| | | | Syngenta Crop Protection | | |
| | | | Greensboro, NC 27419 | | |
| | | | | | |
| | | | Spray Drift Task Force | | |
| | | | 1600 K St, NW | | |
| | | | Washington, DC 20006 | | |
| | | | | | |
| | | | Agricultural Reentry Task Force | | |
| | | | 1350 I Street, NW | | |
| | | | Washington, DC 20005 | | |
| | | | | | |
| | | | FIFRA Endangered Species Task Force | | |
| | | | 1350 I Street, NW | | |
| | | | Washington, DC 20005 | | |
| | | | | | |
| Signature | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |




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| Ingredient p-Dichlorobenzene | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | Any required generic data | | Hysan/AMP | | |
| | | | 9055 Freeway Dr | | |
| | | | Macedonia, OH 44056 | | |
| | | | | | |
| | | | E.I. DuPont De Nemours and Co, Inc | | |
| | | | 1007 Market St | | |
| | | | Wilmington, DE 19898 | | |
| | | | | | |
| | | | Willert Home Products | | |
| | | | 4044 Park Ave | | |
| | | | St Louis, MD 63110 | | |
| | | | | | |
| | | | I. Schneid | | |
| | | | Atlanta, GA 30321 | | |
| | | | | | |
| Signature  | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |




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| Ingredient p-Dichlorobenzene | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | Hysan/AMP | | |
| | | | 9055 Freeway Dr | | |
| | | | Macedonia, OH 44058 | | |
| | | | | | |
| | | | E.I.DuPont De Nemours and Co, Inc | | |
| | | | 1007 Market St | | |
| | | | Wilmington, DE 19898 | | |
| | | | | | |
| | | | Willert Home Products | | |
| | | | 4044 Park Ave | | |
| | | | St Louis, MO 63110 | | |
| | | | | | |
| | | | I. Schneid | | |
| | | | Atlanta, GA 30321 | | |
| | | | | | |
| Signature  | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |




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| Ingredient p-Dichlorobenzene | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | Any required generic data | | Church & Dwight Co, Inc | | |
| | | | 469 North Harrison St | | |
| | | | Princeton, NJ 08543 | | |
| | | | | | |
| | | | HSB Chemical Inc. | | |
| | | | 12208 Quinque Lane | | |
| | | | Clifton, VA 20124 | | |
| | | | | | |
| | | | Landis International, Inc. | | |
| | | | Valdosta, GA 31603 | | |
| | | | | | |
| | | | Residential Exposure Joint Venture | | |
| | | | 900 17th Street, NW, Suite 300 | | |
| | | | Washington, DC 20006 | | |
| | | | | | |
| Signature  | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |




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| | | | 489 North Harrison St | | |
| | | | Princeton, NJ 08543 | | |
| | | | | | |
| | | | HSB Chemical Inc. | | |
| | | | 12208 Quinque Lane | | |
| | | | Clifton, VA 20124 | | |
| | | | | | |
| | | | Landis International, Inc. | | |
| | | | Valdosta, GA 31603 | | |
| | | | | | |
| | | | Residential Exposure Joint Venture | | |
| | | | 900 17th Street, NW, Suite 300 | | |
| | | | Washington, DC 20006 | | |
| | | | | | |
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| Ingredient p-Dichlorobenzene | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | Any required generic data | | IMS Trading, LLC | | |
| | | | 6010 West Wilshire Blvd, #400 | | |
| | | | Los Angeles, CA 90036 | | |
| | | | | | |
| | | | Oxford & Hill Home Products, LLC | | |
| | | | 2800 Biscayne Blvd, Suite 500 | | |
| | | | Miami, FL 33137 | | |
| | | | | | |
| | | | Jiangsu Yangnong Chemical Group Co. | | |
| | | | Valdosta, GA 31603 | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| Signature  | | | Name and Title Matthew Brooks, Director, Ag-Chem Consulting | | Date 10-29-10 |

Front Panel

070305-00003.20110810a

PARAGON
HOUSEHOLD PRODUCTS INC..

Paragon Moth Flakes

ACCEPTED AUG 11 2011

KILLS MOTHS AND CARPET BEETLES

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

ACTIVE INGREDIENT:

Paradichlorobenzene.....EPA Reg. No. 70305-3 99.9%

OTHER INGREDIENTS:..... 0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3

EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

PARA MOTH FLAKES

KILLS MOTHS AND CARPET BEETLES

FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

AUG 11 2011

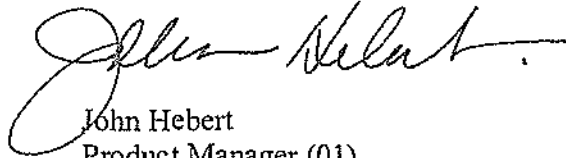
Attention: Dr. Matthew Brooks

| | |
|------------------------|---|
| Subject | Paragon Moth Flakes EPA Reg. No. 70305-3 Amendment to Change Confidential Statement of Formula (CSF) and to Revise Label Your application of February 8, 2011 Your resubmission of August 10, 2011 |
| Purpose | The purpose of this submission is to revise your CSF and label for this product, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). |
| CSF | You have submitted a new CSF (Basic Formulation), dated February 7, 2011, and citations for data supporting a new basic, unregistered source of active ingredient. We have reviewed and found the data acceptable. A copy of your new CSF (Basic Formulation), February 7, 2011, has been placed in our previous versions are obsolete. |
| Labeling | The labeling submitted with your resubmission of August 10, 2011, is acceptable, provided you submit one (1) copy of final printed labeling to us, before you ship your product. |
| Existing stocks | Stocks of product with existing labels may be used for eighteen (18) months. |

Questions

If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Hebert", with a large, stylized initial "J" and a horizontal line extending from the end of the signature.

John Hebert
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)



Source products for 70305-1 and 70305-3

Matthew Brooks

to:

Veronica Dutch

05/28/2012 12:13 PM

Cc:

Dan Peacock

Hide Details

From: Matthew Brooks <mwbrooks01@yahoo.com>

To: Veronica Dutch/DC/USEPA/US@EPA

Cc: Dan Peacock/DC/USEPA/US@EPA

Please respond to Matthew Brooks <mwbrooks01@yahoo.com>

2 Attachments



CSF for 70305-1 May 2012.pdf CSF for 70305-3 May 2012.pdf

Hi Veronica

I got your letters concerning the above products and the needs for new sources because the ones listed in my 2010 DCI response are cancelled. We revised both these products CSFs in 2011. The new ones and the acceptance letters are attached. We also had to slightly revise the labels to reflect the changes in concentrations. Feel free to contact me or Dan Peacock who took care of these issues with me.

Sincerely

Matt Brooks

Matthew Brooks, Ph.D.

703-266-0128 Phone

703-266-4377 Fax

mwbrooks01@yahoo.com

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC..**

Paragon Moth Flakes

KILLS MOTHS AND CARPET BEETLES

NET WT.10 oz (283.5g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

OTHER INGREDIENTS:..... 0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3

EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

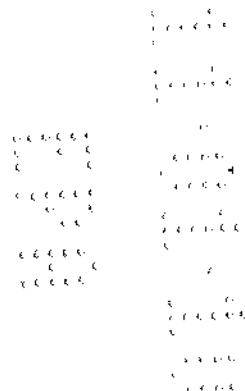
**PARAGON
HOUSEHOLD PRODUCTS INC.**

PARA MOTH FLAKES

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512**



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

| FIRST AID | |
|--|---|
| IF SWALLOWED: | Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. |
| IF ON SKIN OR CLOTHING: | Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. |
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. |
| IF INHALED: | Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222 . | |

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a cool dry place inaccessible to children and pets.

DISPOSAL: Nonrefillable Container. Do not reuse or refill container. If **Empty:** Place in trash or offer for recycling if available. If **Partly Filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: This product can be harmful to children when ingested. Do not allow children to ingest this product.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512



Source products for 70305-1 and 70305-3

Matthew Brooks

to:

Veronica Dutch

05/28/2012 12:13 PM

Cc:

Dan Peacock

Hide Details

From: Matthew Brooks <mwbrooks01@yahoo.com>

To: Veronica Dutch/DC/USEPA/US@EPA

Cc: Dan Peacock/DC/USEPA/US@EPA

Please respond to Matthew Brooks <mwbrooks01@yahoo.com>

2 Attachments



CSF for 70305-1 May 2012.pdf CSF for 70305-3 May 2012.pdf

Hi Veronica

I got your letters concerning the above products and the needs for new sources because the ones listed in my 2010 DCI response are cancelled. We revised both these products CSFs in 2011. The new ones and the acceptance letters are attached. We also had to slightly revise the labels to reflect the changes in concentrations. Feel free to contact me or Dan Peacock who took care of these issues with me.

Sincerely

Matt Brooks

Matthew Brooks, Ph.D.

703-266-0128 Phone

703-266-4377 Fax

mwbrooks01@yahoo.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY
AND POLLUTION PREVENTION

NOV 13 2013

HBC Chemical LLC
c/o
Matthew Brooks
Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 20124

Subject: Notification to revise the Basic Confidential Statement of Formula (CSF)
EPA Registration No. 70305-3
Primary Brand Name: Paragon Moth Flakes
Decision number: 484612
Submission Date: October 31, 2013

Dear Mr. Brooks,

The CSF referred to above, submitted in connection with registration under FIFRA, is acceptable. A copy will be placed in our records. Please note that the record for this product currently contains the following CSF:

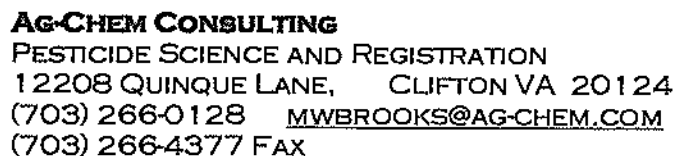
- Basic CSF dated 10/31/13

Any previously dated CSFs are superseded. If you have any questions, please contact me at 703-347-0235 or benbow.gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Benbow", is written over a horizontal line.

Gene Benbow
Wildlife Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)



Reuben Baris PM #7
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Dear Mr. Baris:

Ag-Chem Consulting, on behalf of HBC Chemical LLC, submits the following notification to revise the basic CSF. Box 1, 5, and 7 have been corrected. In box 1 the company name has been changed due to the fact that the company number 70305 has been transferred to HBC Chemical LLC. Box 5 has been changed to reflect the new EPA Product Manager. Box 7 has been revised to correct a typographical error.

Included with this notification are:

One application 8570-1

~~Two~~ ^{Five} copies of the proposed CSF

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for HBC Chemical LLC

[illegible]



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|--|---|--|
| 1. Company/Product Number HBC Chemical LLC / 70305-3 | 2. EPA Product Manager Rueben Baris | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) HBC Chemical LLC/ Paragon Moth Flakes | PM# 7 | |
| 5. Name and Address of Applicant (Include ZIP Code) HBC Chemical LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input checked="" type="checkbox"/> Other - Explain below. |

Explanation: Use additional pages if necessary. (For section I and Section II.)

Notification of Revised Basic CSF

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

| | | | | | |
|--|--|---|--------------------------------------|--|-------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) plastic bag in box | |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. 2-24 oz | No. per container 6-12 | If "Yes" Package wgt | No. per container |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz. | | 5. Location of Label Directions <input checked="" type="checkbox"/> printed on box | |
| 6. Manner in Which Label Is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | | <input type="checkbox"/> Other _____ | | |

Section - IV

| | | | | | |
|--|--|---------------------------------------|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | | | |
| Name Dr. Matthew Brooks | | Title Director, Ag-Chem Consulting | | Telephone No. (Include Area Code) 703-266-0126 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | | | 6. Date Application Received (Stamped) |
| 2. Signature | | 3. Title Regulatory Consultant | | | |
| 4. Typed Name Matthew Brooks | | 5. Date 10/31/13 | | | |



AG-CHEM CONSULTING

PESTICIDE SCIENCE AND REGISTRATION
12208 QUINQUE LANE, CLIFTON VA 20124
(703) 266-0128 MWBROOKS@AG-CHEM.COM
(703) 266-4377 FAX

August 12, 2011

John Hebert
Product Manager 19
Insecticide Branch
Registration Division (7505P)
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Paragon Moth Flakes
Notification of Final Printed Labels
EPA Reg# 70305-3

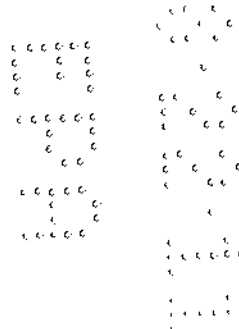
Dear Mr. Hebert,

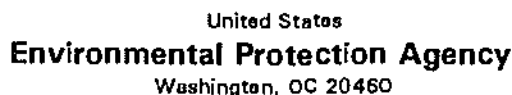
Ag-Chem Consulting, on behalf of Paragon Household Products Inc., hereby submits the following notification of final printed labels for the above product. We have enclosed one (1) copies of the final printed label for your review as requested in your letter of August 11, 2011.

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Very Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products, Inc.





| | |
|-------------------------------------|--------------|
| <input type="checkbox"/> | Registration |
| <input type="checkbox"/> | Amendment |
| <input checked="" type="checkbox"/> | Other |

OPP Identifier Number

| | | |
|---|---|--|
| 1. Company/Product Number Paragon Household Products Inc./70305-3 | 2. EPA Product Manager John Hebert | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product Name Paragon Household Products Inc./Paragon Moth Flakes | PM# 19 | |
| 5. Name and Address of Applicant <i>(Include ZIP Code)</i> Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)ii, my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

☐ Amendment - Explain below.
 ☒ Final printed labels in response to Agency letter dated August 11, 2011

☐ Resubmission in response to Agency letter dated _____
 ☐ "Me Too" Application.

☒ Notification - Explain below.
 ☐ Other - Explain below.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

| | | | | | |
|--|--|--|--|--|--|
| 1. Material This Product Will Be Packaged In: | | | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| | | If "Yes" Unit Packaging wgt. No. per container 8 | | If "Yes" Package wgt No. per container | |
| * Certification must be submitted | | 2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | | | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size of Retail Container 10oz., 283.5 grams | | 5. Location of Label Directions <input checked="" type="checkbox"/> On Container | |
| 6. Manner in Which Label is Affixed to Product | | <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____ | | | |

| | | | | | |
|--|--|-----------------------------------|--|---|--|
| I. Contact Point <i>(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</i> | | | | | |
| Name Dr. Matthew Brooks | | Title Regulatory Consultant | | Telephone No. (Include Area Code) 703-266-0128 | |
| <p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p> | | | | | 8. Date Application Received (Stamped) |
| 2. Signature | | 3. Title Regulatory Consultant | | | |
| 4. Typed Name Matthew Brooks | | 5. Date 8-12-11 | | | |
| 105 | | | | | |

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

Paragon Moth Flakes

**NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
AUG 11 2011**

KILLS MOTHS AND CARPET BEETLES

NET WT.10 oz (283.5g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

OTHER INGREDIENTS:..... 0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3

EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

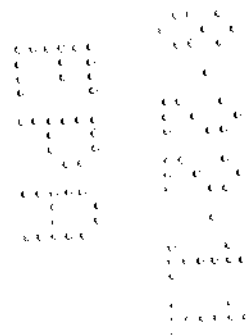
**PARAGON
HOUSEHOLD PRODUCTS INC.**

PARA MOTH FLAKES

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512**



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

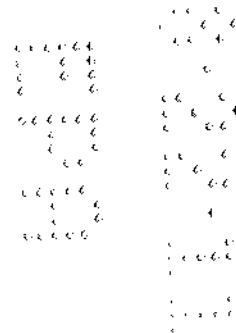
WARNING: Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

| FIRST AID | |
|--|---|
| IF SWALLOWED: | Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. |
| IF ON SKIN OR CLOTHING: | Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. |
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. |
| IF INHALED: | Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222. | |

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.



STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container, in a cool dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Nonrefillable Container. Do not reuse or refill container.

If Empty: Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512

Material Sent for Data Extraction

Reg. # 70305-3

Description: Amendment

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 8/11/2011

☐ Notification Dated _____

☒ New CSF(s) Dated 2-7-2011

☐ Other: _____

☒ Decision #: 446751

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Dan Peacock

Phone: 305-5407 Division: RD

Date: 8 / 15 / 2011

MO DA YR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Decision # 446.751
R 340 S-901345
1155

AUG 11 2011

Attention: Dr. Matthew Brooks

Subject Paragon Moth Flakes
EPA Reg. No. 70305-3
Amendment to Change Confidential Statement of Formula (CSF)
and to Revise Label
Your application of February 8, 2011
Your resubmission of August 10, 2011

Purpose The purpose of this submission is to revise your CSF and label for this product, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

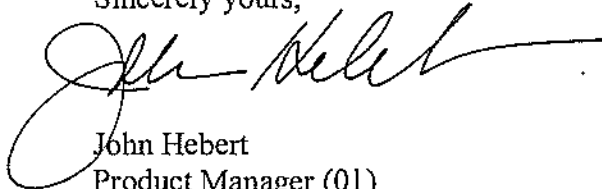
CSF You have submitted a new CSF (Basic Formulation), dated February 7, 2011, and citations for data supporting a new basic, unregistered source of active ingredient. We have reviewed and found the data acceptable. A copy of your new CSF (Basic Formulation), February 7, 2011, has been placed in our previous versions are obsolete.

Labeling The labeling submitted with your resubmission of August 10, 2011, is acceptable, provided you submit one (1) copy of final printed labeling to us, before you ship your product.

Existing stocks Stocks of product with existing labels may be used for eighteen (18) months.

Questions If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Hebert", with a large, stylized initial "J" and a long horizontal stroke extending to the right.

John Hebert
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Location Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash Drive\PDB\Registration Activities\70305-3\70305-3, Rev CSF, new basic source, gen label rev, 8-10-2011, ver 3.doc

Front Panel

070305-00003.20110810a

**PARAGON
HOUSEHOLD PRODUCTS INC..**

Paragon Moth Flakes

ACCEPTED
KILLS MOTHS AND CARPET BEETLES **AUG 11 2011**

**Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:**

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

EPA. Reg. No: 70305-3

OTHER INGREDIENTS:.....0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3

EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

PARA MOTH FLAKES

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512**

Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

| FIRST AID | |
|--|---|
| IF SWALLOWED: | Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. |
| IF ON SKIN OR CLOTHING: | Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. |
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. |
| IF INHALED: | Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222. | |

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container, in a cool dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Nonrefillable Container. Do not reuse or refill container.

If Empty: Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
324A HALF ACRE RD
CRANBERRY, NJ 08512



Re: 70305-3, Labeling Comments, PRIA Due Date: August 11, 2011
(Thursday)

Matthew Brooks to: Dan Peacock

08/10/2011 10:28 PM

Cc: Michele Lussos

Please respond to Matthew Brooks

See attached.

My fault Dan as I had not shown her an example of a note to physician box.

-Matt

Matthew Brooks, Ph.D.

703-266-0128 Phone

703-266-4377 Fax

mwbrooks01@yahoo.com

From: "Peacock.Dan@epamail.epa.gov" <Peacock.Dan@epamail.epa.gov>

To: mwbrooks01@yahoo.com

Sent: Wednesday, August 10, 2011 3:11 PM

Subject: Re: 70305-3, Labeling Comments, PRIA Due Date: August 11, 2011 (Thursday)

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If you or assistance has any questions, please contact me and return the revised labels to me as soon as possible.

Thank You, Daniel B. Peacock, Biologist Tel: 703-305-5407 Fax: 703-308-0029 E-Mail:
peacock.dan@epa.gov Addresses: United States Postal Service (USPS): USEPA, Insecticide-Rodenticide
Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001 Courier

Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

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To: Dan Peacock/DC/USEPA/US@EPA

From: Matthew Brooks <mwbrooks01@yahoo.com>

Date: 08/10/2011 01:16PM

Subject: Re: 70305-3, Labeling Comments, PRIA Due Date: August 11, 2011 (Thursday)

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My assistant was multitasking

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From: Matthew Brooks <mwbrooks01@yahoo.com> **To:** Dan Peacock/DC/USEPA/US **EPADate:** 08/08/2011 02:45 PM **Subject:** Re: 70305-3, Two Questions, Please call, Change Source, PRIA Due Date, Aug 11, 2011

Attached Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

From: "Peacock.Dan@epamail.epa.gov" <Peacock.Dan@epamail.epa.gov> **To:** mwbrooks01@yahoo.com **Sent:** Monday, August 8, 2011 12:23 PM **Subject:** Fw: 70305-3, Two Questions, Please call, Change Source, PRIA Due Date, Aug 11, 2011

Dear Dr. Brooks, Welcome back to VA! I was just checking to determine when you thought that you be supplying the requested information to complete this action: revised CSF with correct year and letter of authorization to cited chemistry data. Thank You, Daniel B. Peacock, Biologist Tel: 703-305-5407 Fax: 703-308-0029E-Mail: peacock.dan@epa.gov Addresses: United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001 Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 08/08/2011 12:19 PM -----

From: Dan Peacock/DC/USEPA/US **To:** mwbrooks01@yahoo.com **Date:** 08/02/2011 11:11 AM **Subject:** 70305-3, Two Questions, Please call, Change Source

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[attachment "revised CSF and LOA august 2011.pdf" deleted by Dan Peacock/DC/USEPA/US]

[attachment "Paragon Moth Flakes label-august 2011.pdf" removed by Dan Peacock/DC/USEPA/US]
[attachment "Bloomtime Biological 8-10-2011- Reg# 71975-1 red.pdf" removed by Dan Peacock/DC/USEPA/US]
[attachment "Bloomtime Biological 6-20-2011- Reg# 71975-1.pdf" removed by Dan Peacock/DC/USEPA/US]
[attachment "Paragon Moth Flakes label-october 2010.pdf" removed by Dan Peacock/DC/USEPA/US]
[attachment "Paragon Moth Flakes label-august 2011.pdf" removed by Dan



Peacock/DC/USEPA/US]Paragon Moth Flakes label-august2011.pdf



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(Thursday)
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Could you send me an E-copy of the original label this AM?

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Decision # 446251

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2340 5-901344
1135

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VA 22202

[attachment "revised CSF and LOA august2011.pdf" deleted by Dan
Peacock/DC/USEPA/US]

[attachment "Paragon Moth Flakes label-august2011.pdf" removed by Dan Peacock/DC/USEPA/US]



70305-3, Rev CSF, new basic source, label comments, 8-10-2011 t,v 1.doc

**Labeling Comments by Dan Peacock, August 10, 2011, on Paragon Moth Flakes,
EPA Reg. No. 70305-3, PRA Due Date: August 11, 2011**

Make the following labeling changes and submit a revised label electronically for faster response:


1. Reformat the "**NOTE TO PHYSICIAN**" text after the "FIRST AID" text as follows:

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash Drive\PDB\Registration Activities\70305-3\70305-3, Rev CSF, new basic source, label comments, 8-10-2011,v 1.doc



Re: 70305-3, Labeling Comments, PRIA Due Date: August 11, 2011
(Thursday) 

Dan Peacock to: Matthew Brooks

08/09/2011 02:26 PM

Dear Dr. Brooks,

Here are my comments on your proposed label.



70305-3, Rev CSF, new basic source, label comments, 8-9-2011,v 1.doc

Please make these changes and submit electronic copies of 1) original label and 2) revised label. as soon as possible.

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division
(7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One
Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

Matthew Brooks

Attached: Matthew Brooks, Ph.D.

08/08/2011 02:45:14 PM

From: Matthew Brooks <mwbrooks01@yahoo.com>
To: Dan Peacock/DC/USEPA/US@EPA
Date: 08/08/2011 02:45 PM
Subject: Re: 70305-3, Two Questions, Please call, Change Source, PRIA Due Date, Aug 11, 2011

Attached

Matthew Brooks, Ph.D.

703-266-0128 Phone

703-266-4377 Fax

mwbrooks01@yahoo.com

From: "Peacock.Dan@epamail.epa.gov" <Peacock.Dan@epamail.epa.gov>

To: mwbrooks01@yahoo.com

Sent: Monday, August 8, 2011 12:23 PM

Subject: Fw: 70305-3, Two Questions, Please call, Change Source, PRIA Due Date, Aug 11, 2011

Dear Dr. Brooks,

Welcome back to VA!

I was just checking to determine when you thought that you be supplying the requested information to complete this action:

revised CSF with correct year and
letter of authorization to cited chemistry data

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide
Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,
Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration
Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington,
VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 08/08/2011 12:19 PM -----

From: Dan Peacock/DC/USEPA/US
To: mwbrooks01@yahoo.com
Date: 08/02/2011 11:11 AM
Subject: 70305-3, Two Questions, Please call, Change Source

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide

Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,
Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration
Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington,
VA 22202

[attachment "revised CSF and LOA august2011.pdf" deleted by Dan Peacock/DC/USEPA/US]

Labeling Comments by Dan Peacock, August 9, 2011, on Paragon Moth Flakes,
EPA Reg. No. 70305-3, PRIA Due Date: August 11, 2011

Make the following labeling changes and submit a revised label electronically for faster response:

1. Add the signal word, "**WARNING**" before "Causes substantial ... "
2. Is the "**NOTICE**" text that California requires the latest one?

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

3. Retain the "**NOTE TO PHYSICIAN**" text after the "**FIRST AID**" text:

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

4. Revise the "**STORAGE AND DISPOSAL**" text as follows:

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container, in a dry place inaccessible to children and pets. Keep containers closed and away from other chemicals

Pesticide Disposal and Container Handling: Nonrefillable Container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

5. Replace this text, which appeared in the Label Table of the original PDB RED

IMPORTANT: This product can be harmful to children when ingested. Do not allow children to ingest this product.

with the text that appeared in the revised ,December 2008 RED

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash Drive\PDB\Registration Activities\70305-3\70305-3, Rev CSF, new basic source, label comments, 8-9-2011,v 1.doc



Fw: 70305-3, Two Questions, Please call, Change Source, PRIA Due Date,
Aug 11, 2011
Dan Peacock to: mwbrooks01

08/08/2011 12:23 PM

Dear Dr. Brooks,

Welcome back to VAI

I was just checking to determine when you thought that you be supplying the requested information to complete this action:

1. revised CSF with correct year and
2. letter of authorization to cited chemistry data

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Decision # 446251
R340 5-892448
1135

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 08/08/2011 12:19 PM -----

From: Dan Peacock/DC/USEPA/US
To: mwbrooks01@yahoo.com
Date: 08/02/2011 11:11 AM
Subject: 70305-3, Two Questions, Please call, Change Source

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202



70305-3, Two Questions, Please call, Change Source
Dan Peacock to: mwbrooks01

08/02/2011 11:11 AM

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division
(7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One
Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

*He called 8/2/2011
① wrong info on CSF*

*② will take care of
Marty 8/8/2011*

Done 8/11/2011

FEE

DP BARCODE No.: 391871
PC Code(s): 061501
FOOD Use: No

EPA Reg. No.: 70305-3

DECISION No.: 446751
ACTION CODE: 340
NON-FOOD Use: No

DATE: July 18, 2011

SUBJECT: Product Name: Para Moth Flakes

FROM: Akiva Abramovitch, Ph. D.
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

[Handwritten signature]

[Handwritten signature] 7/12/11

TO: Daniel Peacock/John Hebert, PM 7
Insecticide-Rodenticide Branch / Registration Division (7505P)

Company Name: Paragon Household Products.
Formulation Type: Solid

INTRODUCTION:

The applicant petitioned to replace the previously accepted basic CSF dated 1/13/06 with this basic CSF dated 2/7/10 which uses an unregistered source of para-dichlorobenzene from [REDACTED]. The registrant claims that the [REDACTED] is also the source of para-dichlorobenzene used by HBC Chemicals, EPA Reg. No. 51311-3.

SUMMARY OF FINDINGS:

The product chemistry data for the HBC identical product was provided in MRID 473923-01 to support the registration of their product. The data was reviewed in DP 352262 for the registration and in DP 386506 for the re-registration of EPA reg. No. 51311-3.

CONCLUSIONS:

TRB has concluded that the registrant can rely on the data from HBC chemicals to support the registration of their product. The PM should ask for an authorization letter from HBC allowing Paragon to use their data. The Basic CSF dated 2/7/10 will supersede the previously accepted Basic CSF currently on file.

Product ingredient source information may be entitled to confidential treatment

Chem

DATA PACKAGE BEAN SHEET

Date: 14-Jul-2011

Page 1 of 1

Decision #: 446751

DP #: (391871)

PRIA

Parent DP #:

Submission #: 892448

E-Sub #:

*** Registration Information ***

Registration: **70305-3 - PARA MOTH FLAKES**

Company: 70305 - PARAGDN HDUSEHOLD PRDDUCTS INC

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# PY1 S-7227

Risk Manager Reviewer: Daniel Peacock DPEACDCK

Sent Date: _____

Calculated Due Date: 11-Aug-2011

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R340) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMENT)

Ingredients: 06150 t, Paradichlorobenzene(100%)

R340
#29152

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 14-Jul-2011

Due Back: _____

DP Ingredient: 06150 t, Paradichlorobenzene

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 29-Jul-2011

Team Name: *CHEM*

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Chemist,

Please review the company's request to revise the CSF to reflect an unregistered source. They claim that we previously reviewed the data (MRID No. 473923-01) under for 51311-3. So it should be just a matter of confirming that they are citing the correct data.

I have included the following:

1. app form
2. cover ltr
3. CSF
4. Data Matrix
5. Label

Let me know if you need anything else. I apologize for not sending this request earlier.

Dan Peacock, 305-5407

DATE OUT: 23 Sept 2008

SUBJECT: PRODUCT CHEMISTRY REVIEW MP [] EP [x]
DP BARCODE No.: D352262
Reg. File Symbol No.: 51311-G
PRODUCT NAME: Moth Guard
COMPANY: HBC Chemical, Incorporated
Decision No.: 391856 PC CODE: 061501
FOOD USE: [] Integrated Formulation []

FROM: Bruce F. Kitchens, Chemist
Technical Review Branch
Registration Division (7505P)

TO: RM #01, Venus Eagle/Daniel Peacock
Insecticide-Rodenticide Branch (7505P)
Registration Division (7505P)

Bruce F. Kitchens
23 Sept 2008
SBM 9/23/08

INTRODUCTION:

The registrant, HBC Chemical, Incorporated is submitting an application to register the proposed end-use product, Molh Guard. The active ingredient in this product is p-Dichlorobenzene at a label nominal concentration of 99.80% a.i. This product is intended for use as an insecticide. In addition, the registrant states that the proposed product is identical to EPA Reg. No. 1475-39 Enoz Para Moth Balls. In support of this request, the registrant has submitted a basic Confidential Statement of Formula (CSF) dated 28 Mar 2008, a draft label and product chemistry data contained in MRID# 473923-01. The Technical Review Branch (TRB) has been asked to review this submission.

SUMMARY OF FINDINGS

TRB has reviewed this submission and reports the following findings:

1. This product is produced from an integrated formulation process. This means that the active ingredient is the result of intended chemical reactions. The proposed end use product is composed of 100% TGA1.
2. The impurity profile has been adequately detailed. All impurities have been identified and quantified. The registrant did not declare any impurities of toxicological concern. See the confidential appendix for details.
3. The nominal concentration of the active ingredient listed on the proposed basic CSF and the master draft label are the same.

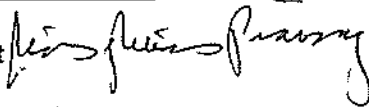
The active ingredient nominal concentration is listed incorrectly on the sublabel entitled - Storage Closet & Container Uses (16oz., 24 oz sizes). The master label lists the active ingredient nominal concentration at 99.80% while the sublabel lists 99.90% as the active ingredient nominal concentration.

PRODUCT CHEMISTRY DATA (SERIES 830 Subgroup A)

| Subgroup A -- Product Identity and Composition | <u>Data Required</u> <u>Fulfilled</u> | <u>MRID No.</u> |
|--|--|-----------------|
| 830.1550. Chemical Identity | Y | 473923-01 |
| 830.1600. Beginning Materials | Y | 473923-01 |
| 830.1620. Production Process | Y | 473923-01 |
| 830.1670. Discussion of Impurities | Y | 473923-01 |
| 830.1700. Preliminary Analysis | Y | 473923-01 |
| 830.1750. Certified Limits | Y | 473923-01 |
| 830.1800. Enforcement Analytical Method | Y | 473923-01 |

DATE OUT: 12/MAY/2011

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [X]
BARCODE NO.: D386506 REG./FILE SYMBOL NO.: 51311-3
PRODUCT NAME: MothGuard Old Fashioned Moth Balls MRID NO.: 473923-01
COMPANY NAME: HBC Chemical Company ACTION CODE: 676
CONTRACTOR: CSC PROJECT CODE: PRD-277 OPHI

FROM: Maria Rivera Piansay, Chemist 
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 3058, was issued on September 28, 2007 (revised December 9, 2008) for the Active Ingredient (AI) p-Dichlorobenzene. According to the RED, the generic data base supporting the reregistration of p-Dichlorobenzene for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the p-Dichlorobenzene RED, HBC Chemical Company provided an un-audited summary of storage stability results, dated 9/30/2010; a Confidential Statement of Formula (CSF) for the basic formulation, dated 10/22/2010; CSFs for four alternate formulations, dated 10/20/2010 or 10/22/2010; EPA Form 8570-35 (Data Matrix), dated 10/22/2010; and a draft label (pin-punched 11-01-10) to supplement cited product chemistry data. The registrant cited product chemistry data, including MRID No. 473923-01. The registrant is requesting reregistration of their product, MothGuard Old Fashioned Moth Balls, EPA Reg. No. 51311-3.

FINDINGS:

1. EPA Reg. No. 51311-3 is an end-use insecticide, containing the active ingredient, p-Dichlorobenzene, with a label claim nominal concentration of 99.75%. The product is an insecticide for use in killing carpet beetles and moths and their eggs and larvae. The product is for use in clean, airtight containers (e.g., chests, trunks, garment bags) and storage closets. The product is produced by an integrated system.
2. The CSFs for the basic formulation (dated 10/22/10) and the four alternate formulations (dated 10/20/10) are acceptable. The nominal concentration of the active ingredient agrees with that on the draft label, meeting PR Notice 91-2. The certified limits for the active ingredient and inert ingredients are acceptable in accordance with 40 CFR §158.175(b)(2). All ingredients listed on the CSFs are cleared for use in pesticide formulations.

3. Except for Finding 4, the data reported in MRID No. 473923-01 satisfy the product chemistry requirements under Subgroups A and B, which pertain to Product Identity, Composition, and Analysis, and Physical and Chemical Properties, respectively.
4. The requirements concerning Guideline 830.6317 (Storage Stability) and Guideline 830.6320 (Corrosion Characteristics) are not satisfied. Un-audited interim results demonstrate product stability for 9 months. A final report must be provided. The statement regarding container integrity must be supported with data. Results for a minimum of 1 year from a storage stability and corrosion characteristics study must be provided. The product should be tested in its commercial packaging.

In addition, the requirements concerning Guideline 830.7050 (UV/Visible Absorption) are not satisfied. The UV/visible absorption spectrum of the product must be provided. Data described in OPPTS 830.7050(d) must be submitted, including a recent test spectrum on appropriate reference materials for photometric and wavelength accuracy.

5. The Enforcement Analytical Method for the determination of active ingredient content in the product is presented in MRID No. 473923-01. The method is adequate and satisfies the requirements under Guideline 830.1800.
6. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2 and 97-6. The Physical or Chemical Hazards Statement on the draft label is acceptable. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

[Note to Label Reviewer: The following revisions to the label are recommended: (a) place the Storage and Disposal Statements in a text box for prominence; (b) under the Storage and Disposal Statements, change the Storage subheading to read "Pesticide Storage;" and (c) under the Storage and Disposal Statements, change the Disposal subheading to read "Pesticide Disposal and Container Handling."]

CONCLUSIONS:

After submission of data, as noted in Finding 4, the registrant will satisfy the product chemistry requirements for the reregistration of EPA Reg. No. 513II-3.

Product Chemistry Data**Subgroup A: Guideline Series 830.1550 - 830.1800 (40 CFR §158.320 - 158.355)****Product Identity, Composition, and Analysis**

| Guideline Reference No. (GRN) / Title 830 | 40 CFR § | MRID Number | Data Fulfilled |
|---|-----------------|---|-----------------------|
| 830.1550 Product Identity and Composition | 158.320 | CSFs 473923-01 (not current) | Y |
| 830.1600 Description of Materials Used to Produce the Product | 158.325 | 473923-01 and CSFs | Y |
| 830.1620 Description of Production Process | 158.330 | 473923-01 | Y |
| 830.1650 Description of Formulation Process | 158.335 | <i>[Not required for products produced by an integrated system]</i> | NR |
| 830.1670 Discussion of Formation of Impurities | 158.340 | 473923-01 | Y |
| 830.1700 Preliminary Analysis | 158.345 | 473923-01 | Y |
| 830.1750 Certified Limits | 158.350 | CSFs 473923-01 (not current) | Y |
| 830.1800 Enforcement Analytical Method | 158.355 | 473923-01 | Y |

Subgroup B: Guideline Series 830.6302 - 830.7950 (40 CFR §158.310)**Physical and Chemical Properties**

| Guideline Reference No. (GRN) / Title 830 | Value or Qualitative Description | MRID Number | Data Fulfilled |
|--|---|--------------------|-----------------------|
| .6302 Color | White | 473923-01 | Y |
| .6303 Physical State | Crystalline flakes/ powder | 473923-01 | Y |
| .6304 Odor | Pleasant | 473923-01 | Y |

| Guideline Reference No. (GRN) / Title 830 | Value or Qualitative Description | MRID Number | Data Fulfilled |
|--|--|-------------|-------------------|
| .6313 Stability to Normal and Elevated Temperature, Metals, and Metal Ions | p-Dichlorobenzene is known to be stable to metal ions and elevated temperatures. | 473923-01 | Y |
| .6314 Oxidation/ Reduction: Chemical Incompatibility | p-Dichlorobenzene is chemically inert. | 473923-01 | Y |
| | The label states: "This product can damage some plastics, use only in polyethylene or polypropylene containers. Paradichlorobenzene should not be mixed or placed in contact with other moth preventative chemicals." | Label | Y |
| .6315 Flammability/Flame Extension | 149.9°F (65.5°C) (pure active) | 473923-01 | Y |
| .6316 Explodability | Not explosive (pure active) | 473923-01 | Y |
| .6317 Storage Stability | p-Dichlorobenzene is a highly stable organochlorine compound. | 473923-01 | — |

| Guideline Reference No. (GRN) / Title 830 | Value or Qualitative Description | MRID Number | Data Fulfilled | | | | | | | | | | | | | | |
|--|---|-------------------|-------------------|------------|-----------------|---------|--------|----------|--------|----------|--------|----------|--------|-----------|-----|--|---|
| .6317 (continued) | <table><tr><th colspan="2">p-Dichlorobenzene</th></tr><tr><th>Time Point</th><th>Active Conc.</th></tr><tr><td>Initial</td><td>97.39%</td></tr><tr><td>3 months</td><td>97.62%</td></tr><tr><td>6 months</td><td>97.62%</td></tr><tr><td>9 months</td><td>98.25%</td></tr><tr><td>12 months</td><td>---</td></tr></table> | p-Dichlorobenzene | | Time Point | Active Conc. | Initial | 97.39% | 3 months | 97.62% | 6 months | 97.62% | 9 months | 98.25% | 12 months | --- | Un-audited summary of storage stability results, dated 9/30/2010 | U |
| | p-Dichlorobenzene | | | | | | | | | | | | | | | | |
| | Time Point | Active Conc. | | | | | | | | | | | | | | | |
| | Initial | 97.39% | | | | | | | | | | | | | | | |
| | 3 months | 97.62% | | | | | | | | | | | | | | | |
| | 6 months | 97.62% | | | | | | | | | | | | | | | |
| | 9 months | 98.25% | | | | | | | | | | | | | | | |
| | 12 months | --- | | | | | | | | | | | | | | | |
| Interim results demonstrate stability for 9 months. No significant change in the active ingredient concentration was observed over the 9- month interval. The product was tested in unidentified containers. | | | | | | | | | | | | | | | | | |
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| .6317 (continued) | In progress. | Data Matrix | I | | | | | | | | | | | | | | |
| .6319 Miscibility | Not applicable. p- Dichlorobenzene is a solid. | 473923-01 | N/A | | | | | | | | | | | | | | |
| | The product is ready-to- use (i.e., is to be applied undiluted). | Label | Y | | | | | | | | | | | | | | |
| .6320 Corrosion Characteristics | Not corrosive. | 473923-01 | --- | | | | | | | | | | | | | | |
| | In progress. | Data Matrix | I | | | | | | | | | | | | | | |
| .6321 Dielectric Breakdown Voltage | Not applicable. The product is not for use on electrical equipment. | 473923-01 | N/A | | | | | | | | | | | | | | |
| .7000 pH | Not applicable. p- Dichlorobenzene is a water insoluble compound. | 473923-01 | N/A | | | | | | | | | | | | | | |
| .7050 UV/ Visible Light Absorption | | | G | | | | | | | | | | | | | | |

Confidential Appendix A830.1550 Product Identity and Composition


EPA Reg. No. 51311-3 is an end-use product produced by an integrated system. The product contains the active ingredient, p-Dichlorobenzene, with a nominal concentration of 99.75%. Nominal concentrations and upper/lower certified limits are identified on the CSFs.

830.1600 Description of Materials Used to Produce the Product

The starting materials used in the production of EPA Reg. No. 51311-3 are identified in MRID No. 473923-01. The CSFs identify various fragrances.

830.1620 Description of Production Process

The production process is described in MRID No. 473923-01. [Note that MRID No. 473923-01 includes a chemical reaction equation to supplement the following discussion.]

830.1670 Discussion of Formation of Impurities

As noted in MRID No. 473923-01, the product contains [redacted] impurity, [redacted]. The CSFs each list [redacted]. The product also may contain [redacted].

830.1700 Preliminary Analysis

Results from the preliminary analysis of five batches of the product, p-Dichlorobenzene, are provided in MRID No. 473923-01, and are summarized in the following exhibit. Presumably, active ingredient content was determined by the GC-FID method.

Manufacturing process information may be entitled to confidential treatment

830.1750 Certified Limits

The CSF for the basic formulation, dated 10/22/2010, provides the following certified limits for the active ingredient:

| Component | Lower Certified Limit | Nominal Concentration | Upper Certified Limit |
|-------------------|-----------------------|-----------------------|-----------------------|
| | % by weight | | |
| p-Dichlorobenzene | 97 | 99.75 | 103 |

Upper and lower certified limits for the active ingredient are standard (or within the standard certified limit range).

THIS REVIEW CONTAINS FIFRA CBI

21-Day Screen of Amendment
(Completed by Contractor)

21-day Expires on 4-11-11

Document Part Of: 70305-3
MRID, If Any: _____

Content Screen: Recommended to
Pass/Fail

86-5 Review: Passed/Failed/NA

Overall Status: Pass/Fail

Document returned to:

STEPHEN SETHAIBLE

PM-7

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 3-21-11
 Experts In-Processing Signature: MF HARRINGTON Date 3-22-11 Fee Paid: Yes ___
 Division management contacted on issues No ___ Yes ___ Date ___

| EPA Reg. Number: <u>70305-3</u> | | EPA Receipt Date: <u>3-21-11</u> | | | | |
|---------------------------------|---|----------------------------------|----|-----|----|------|
| Items for Review | | | | Yes | No | N/A* |
| 1 | Application Form (EPA Form 8570-1)(link to form) signed & complete including package type | | | X | | |
| 2 | Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form) | | | X | | |
| | a) All inerts (link to http://www.epa.gov/oppr001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) | yes | no | | | |
| 3 | Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack) | | | X | | |
| | Certificate and data matrix consistent | | | X | | |
| | If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B) | yes | no | | | |
| | If applicable, is there a letter of Authorization for exclusive use only. | | | | | |
| 4 | Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical) | | | | | X |
| 5 | Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack) | | | X | | |
| | a) Selective Method (Fee category experts use) | X | | | | |
| | b) Cite-All (Fee category experts use) | | | | | |
| | c) Applicant owns all data (Fee category experts use) | | | | | |
| 6 | 5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels) | | | X | | |

| | | | | |
|----|--|--|--|---|
| 7 | Is the data package consistent with PR Notice 86-5 (link to PRN 86-5) | | | X |
| 8 | Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm) | | | X |
| 9 | If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html) | | | X |
| 10 | Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C. | | | |
| | a) List study (or studies) not included with application | | | |

Comments:

There are no studies associated
with this amendment.

Active ingredient and impurity only.

TO 3/28/11

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are strongly encouraged to verify that all inert ingredients have been approved for the application's uses even if a product is currently registered by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/opppbpd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 22, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-446751
EPA File Symbol or Registration Number: 70305-3
Product Name: PARA MOTH FLAKES
EPA Receipt Date: 21-Mar-2011
EPA Company Number: 70305
Company Name: PARAGON HOUSEHOLD PRODUCTS INC

MATTHEW BROOKS, PH.D.
AG-CHEM CONSULTING
PARAGON HOUSEHOLD PRODUCTS INC
12208 QUINQUE LANE
CLIFTON, VA 20124-

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 308-9362.

Sincerely,

Teresa Downs
Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

JK

{892448H~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S-

892448

EPA File Symbol/Reg. No.

70305--3

Pin-Punch Date:

3/21/2011

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R340

Granted: R340

Amount Due: \$ 3,617.⁰⁰

Parent/Child Decisions:

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: 

Date: 3-22-11

Remarks:

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 252T57QF

Agency Tracking ID: 74185875280

Transaction Date and Time: 03/20/2011 23:25 EDT

Payment Summary

| Address Information | Account Information | Payment Information |
|---|---|---|
| Account Holder Name: Matthew Brooks 12208 Quinke Billing Address: Lane Billing Address 2: City: Clifton State / Province: VA Zip / Postal Code: 20124 Country: USA | Card Type: Visa Card Number: *****1584 Decision Number: Registration Number: 70305-2 Company Name: Paragon Household Product Company Number: 70305 Action Code: R340 | Payment Amount: \$3,617.00 Transaction Date 03/20/2011 and Time: 23:25 EDT |

一、二、三、四、五、六、七、八、九、十、十一、十二、十三、十四、十五、十六、十七、十八、十九、二十、二十一、二十二、二十三、二十四、二十五、二十六、二十七、二十八、二十九、三十、三十一、三十二、三十三、三十四、三十五、三十六、三十七、三十八、三十九、四十、四十一、四十二、四十三、四十四、四十五、四十六、四十七、四十八、四十九、五十、五十一、五十二、五十三、五十四、五十五、五十六、五十七、五十八、五十九、六十、六十一、六十二、六十三、六十四、六十五、六十六、六十七、六十八、六十九、七十、七十一、七十二、七十三、七十四、七十五、七十六、七十七、七十八、七十九、八十、八十一、八十二、八十三、八十四、八十五、八十六、八十七、八十八、八十九、九十、九十一、九十二、九十三、九十四、九十五、九十六、九十七、九十八、九十九、一百。

FW: EPA Registration# for Para
Matthew Brooks
to:
Dan Peacock
12/09/2010 12:01 PM
Show Details

70305-3

Hi Dan

Revised CSFs attached. Below is the email trail where I got the new registration number. I am getting a copy of the last PO to send to you.

-Matt

Matthew Brooks, Ph.D.
703-266-0128 Phone
703-266-4377 Fax
mwbrooks01@yahoo.com

--- On Wed, 10/27/10, Amy Silverberg <AmySilverberg@hberger.com> wrote:

From: Amy Silverberg <AmySilverberg@hberger.com>
Subject: FW: EPA Registration# for Para
To: "Matthew Brooks" <mwbrooks01@yahoo.com>
Date: Wednesday, October 27, 2010, 7:50 AM

Matt,

Please see below for the EPA Registration number.

Please let us know the status.

Thanks

Amy Silverberg

Purchasing Department

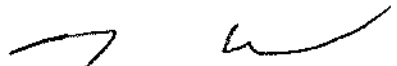


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

| Date February 7, 2011 | | | EPA Reg No./File Symbol 70305-3 | | Page 1 of 5 |
|--|--|-------------|--|--------|--------------------------|
| Applicant's/Registrant's Name & Address Paragon Household Products 324A Half Acre Rd. Cranberry NJ 08512 | | | Product Paragon Molh Flakes | | |
| Ingredient p-Dichlorobenzene (PC Code 061501) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.1100 | Acute Oral Tox | 40521001 | Chlorobenzene Producers Association | Old | In RED |
| 870.1200 | Acute Dermal Tox-Rabbit | 40521001 | Chlorobenzene Producers Association | Old | In RED |
| 870.1300 | Acute Inhalation Tox-Rat | 41410901 | Chlorobenzene Producers Association | Old | In RED |
| 870.2400 | Acute Eye Irritation | 42205301 | Chlorobenzene Producers Association | Old | In RED |
| 870.2500 | Acute Dermal Irritation | 42205302 | Chlorobenzene Producers Association | Old | In RED |
| 870.2600 | Skin Sensitization-Guinea Pig | 42205303 | Chlorobenzene Producers Association | Old | In RED |
| 870.3150 | 90 Day Oral Toxicity-Rat | 43988801 | Monsanto Company | Pay | In RED |
| 870.3200 | 21-Day Dermal Toxicity-Rat | 41315001 | Chlorobenzene Producers Association | Old | In RED |
| 870.3465 | 90-Day Inhalation Toxicity-Dog | 41822801 | Chlorobenzene Producers Association | Old | In RED |
| 870.3700 | Prenatal Development Toxicity-Rat | 42619601 | Chlorobenzene Producers Association | Old | In RED |
| 870.3700 | Prenatal Development Toxicity-Rabbit | 40568001 | Chlorobenzene Producers Association | Old | In RED |
| 870.3800 | Reproduction and Fertility Effects-Rat | 41108801 | Chlorobenzene Producers Association | Old | In RED |
| 830.4100 | Chronic Toxicity-Dog | 43988802 | Monsanto Company | Pay | In RED |
| 870.4300 | Combined Chronic Feeding/Carcinogenicity-Rat | 40521005 | Chlorobenzene Producers Association | Old | In RED |
| 870.4300 | Combined Chronic Feeding/Carcinogenicity-Mouse | 40521005 | Chlorobenzene Producers Association | Old | In RED |
| Signature  | | | Name and Title Dr. Matthew Brooks, Director | | Date February 7, 2011 |




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DATA MATRIX

| Date February 7, 2011 | | | EPA Reg No./File Symbol 70305-3 | | Page 2 of 5 |
|---|---|-------------|--|--------|------------------|
| Applicant's/Registrant's Name & Address Paragon Household Products 324A Half Acre Rd. Cranberry NJ 08512 | | | Product Paragon Molh Flakes | | |
| Ingredient p-Dichlorobenzene (PC Code 061501) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.5100 | Bacterial Reverse Mutation | 40521004 | Chlorobenzene Producers Association | Old | In RED |
| 870.5100 | Bacterial Reverse Mutation | 40568002 | Chlorobenzene Producers Association | Old | In RED |
| 870.5100 | Bacterial Reverse Mutation | 40568003 | Chlorobenzene Producers Association | Old | In RED |
| 870.5275 | Sex-Linked Recessive Lethal Test | 40521007 | Chlorobenzene Producers Association | Old | In RED |
| 870.5300 | Cytogenetics-Mouse Lymphoma Mutagenic Assay | 40521007 | Chlorobenzene Producers Association | Old | In RED |
| 870.5300 | Cytogenetics-Mouse Lymphoma Mutagenic Assay | 40521013 | Chlorobenzene Producers Association | Old | In RED |
| 870.5300 | Cytogenetics-Mouse Lymphoma Mutagenic Assay | 40521014 | Chlorobenzene Producers Association | Old | In RED |
| 870.5375 | Chromosomal Aberration | 43368448 | Bayer Cropscience | Old | In RED |
| 870.5375 | Chromosomal Aberration | 43868210 | Bayer Cropscience | Old | In RED |
| 870.5375 | Cytogenetics-Chromatid Exchange | 40521007 | Chlorobenzene Producers Association | Old | In RED |
| 870.5395 | Mouse Micronucleus assay- Cytogenetics | 43368447 | Bayer Cropscience | Old | In RED |
| 870.5395 | In Vitro Mammalian Cytogenetics Test | 40521012 | Chlorobenzene Producers Association | Old | In RED |
| 870.5450 | Rodent Dominant Lethal Assay | 40521011 | Chlorobenzene Producers Association | Old | In RED |
| 870.5550 | Unscheduled DNA Synthesis | 40521008 | Chlorobenzene Producers Association | Old | In RED |
| 870.5900 | In Vitro Sister Chromatid Exchange Assay | 40521007 | Chlorobenzene Producers Association | Old | In RED |
| Signature  | | | Name and Title Dr. Matthew Brooks, Director | | Date 2/7/2011 |

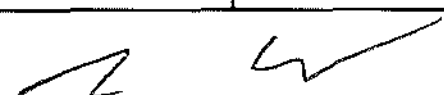


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DATA MATRIX

| Date February 7, 2011 | | | EPA Reg No./File Symbol 70305-3 | | Page 3 of 5 |
|---|--|-------------|--|----------|------------------|
| Applicant's/Registrant's Name & Address Paragon Household Products 324A Hall Acre Rd. Cranberry NJ 08512 | | | Product Paragon Molh Flakes | | |
| Ingredient p-Dichlorobenzene (PC Code 061501) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.6200 | Acute Neurotoxicity Screening Battery | 43350601 | Chlorobenzene Producers Association | Old | In RED |
| 870.6200 | Subchronic Neurotoxicity Screening Battery | 43350602 | Chlorobenzene Producers Association | Old | In RED |
| 870.7485 | General Metabolism | 41697801 | Chlorobenzene Producers Association | Old | In RED |
| | | | | | |
| 875.2400 | Dermal Exposure | 43716501 | Recochem Inc. | Old | In RED |
| 870.2500 | Inhalation Exposure | | | Data Gap | In RED |
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| Signature  | | | Name and Title Dr. Matthew Brooks, Director | | Date 2/7/2011 |



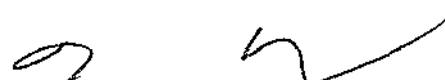
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DATA MATRIX

| Date February 7, 2011 | | | EPA Reg No./File Symbol 70305-3 | | Page 4 of 5 |
|---|--|-------------|--|--------|------------------|
| Applicant's/Registrant's Name & Address Paragon household Products 324A Half Acre Rd. Cranberry NJ 08512 | | | Product Para Moh Flakes | | |
| Ingredient p-Dichlorobenzene (PC Code 061501) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 158.165 | Description of formulation process | 47392301 | HBC Chemical | Pay | |
| 158.167 | Discussion of Impurities | 47392301 | HBC Chemical | Pay | |
| 158.170 | Preliminary Analysis | 47392301 | HBC Chemical | Pay | |
| 157.175 | Certified Limits | 47392301 | HBC Chemical | Pay | |
| 158.180 | Enforcement Analytical Method | 47392301 | HBC Chemical | Pay | |
| 158.155 | Product Identity and Composition | 47392301 | HBC Chemical | Pay | |
| 158.160 | Description of Materials used to produce the product | 47392301 | HBC Chemical | Pay | |
| 158.162 | Description of Production Process | 47392301 | HBC Chemical | Pay | |
| 830.6316 | Explosibility | 47392301 | HBC Chemical | Pay | |
| 830.6319 | Miscibility | 47392301 | HBC Chemical | Pay | |
| 830.6320 | Corrosion Characteristics | 47392301 | HBC Chemical | Pay | |
| 830.6321 | Dielectric Breakdown Voltage | 47392301 | HBC Chemical | Pay | |
| 830.7100 | Viscosity | 47392301 | HBC Chemical | Pay | |
| | | | | | |
| | | | | | |
| Signature  | | | Name and Title Dr. Matthew Brooks, Director | | Date 2/7/2011 |




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

| | | | | | |
|---|-------------------------|-------------|--|--------|------------------|
| Date February 7, 2011 | | | EPA Reg No./File Symbol 70305-3 | | Page 5 of 5 |
| Applicant's/Registrant's Name & Address Paragon Household Products 324A Hall Acre Rd. Cranberry NJ 08512 | | | Product Para Mojh Flakes | | |
| Ingredient p-Dichlorobenzene (PC Code 061501) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7370 | Disassociation Constant | 47392301 | HBC Chemical | Pay | |
| 830.7950 | Vapor Pressure | 47392301 | HBC Chemical | Pay | |
| 830.6302 | Color | 47392301 | HBC Chemical | Pay | |
| 830.6303 | Physical State | 47392301 | HBC Chemical | Pay | |
| 830.6304 | Odor | 47392301 | HBC Chemical | Pay | |
| 830.7220 | Boiling Point | 47392301 | HBC Chemical | Pay | |
| 830.7300 | Density | 47392301 | HBC Chemical | Pay | |
| 830.7840 | Solubility | 47392301 | HBC Chemical | Pay | |
| 63-5 | Melting Point | 47392301 | HBC Chemical | Pay | |
| 830.7000 | pH | 47392301 | HBC Chemical | Pay | |
| 830.6317 | Storage Stability | 47392301 | HBC Chemical | Pay | |
| 830.7550 | Octanol Water Partition | 47392301 | HBC Chemical | Pay | |
| 830.6313 | Stability | 47392301 | HBC Chemical | Pay | |
| 830.6314 | Oxidation/Reduction | 47392301 | HBC Chemical | Pay | |
| 830.6315 | Flammability | 47392301 | HBC Chemical | Pay | |
| Signature  | | | Name and Title Dr. Matthew Brooks, Director | | Date 2/7/2011 |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, DPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

| | |
|---|--|
| Applicant's/Registrant's Name, Address, and Telephone Number Paragon Products c/o Ag-Chem Consulting 12208 Quince Lane Clifton VA 20124 703-266-0128 | EPA Registration Number/File Symbol 70305-3 |
| Active Ingredient(s) and/or representative test compound(s) p-Dichlorobenzene | Date 2/8/2011 |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor, nonfood | Product Name Para Moth Flakes |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

2/8/2011

Typed or Printed Name and Title

Matthew Brooks, Regulatory Consultant



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
703-266-4377 Fax

February 8, 2011

To: John Hebert/Dan Peacock
Product Manager 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501
Subject: Amendment to Para Moth Flakes
EPA Registration #70305-3

Dear Mr. Hebert;

Ag-Chem Consulting, on behalf of Paragon Household Products (324 Half Acre Road, Cranbury NJ 08512) hereby submits the following application to amend the above product. Paragon wishes to:

1- Add an unregistered source of active ingredient

Paragon is working with HBC Chemicals and is using the same source of material for its active ingredient as HBC uses for its MothGuard Registration (Reg # 51311-3). The product chemistry report used for that registration and cited for this one (MRID# 47392301) states the synthesis concludes with the formation of p-dichlorobenzene flakes and these flakes are then either bagged for sale or compressed into balls. This registration represents the former (bagged flakes).


Included in support of this registration are:

An application;
A Confidential Statement of Formula
A Data Matrix;
A Certification with respect to citation of data form
One copy of the revised label

We believe this action should be coded under PRIA II as R340, amendment requiring data review within RD. We have prepaid a fee of \$3,617.

As always I look forward to working with you on this registration. Please do not hesitate to contact me at 703-266-0128 should you require additional information.

Very Sincerely,


Matthew Brooks
Director, Ag-Chem Consulting LLC
An Authorized Representative for Paragon Household Products



United States
Environmental Protection Agency
Washington, DC 20460

| | |
|-------------------------------------|--------------|
| <input type="checkbox"/> | Registration |
| <input checked="" type="checkbox"/> | Amendment |
| <input type="checkbox"/> | Other |

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|--|--|
| 1. Company/Product Number Paragon Household Products/ 70305-3 | 2. EPA Product Manager John Hebert | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Paragon Household Products/ Paragon Moth Flakes | PM# 19 | |
| 5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input checked="" type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | | | |
|-------------------------------------|---|--------------------------|---|
| <input checked="" type="checkbox"/> | Amendment - Explain below. | <input type="checkbox"/> | Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> | Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> | "Mo Too" Application. |
| <input type="checkbox"/> | Notification - Explain below. | <input type="checkbox"/> | Other - Explain below. |

Explanation: Use additional pages if necessary. (For section I and Section II.)


Amendment to revise CSF to reflect [REDACTED] unregistered source. All data has been previously submitted for another similar product.

Product ingredient source information may be entitled to confidential treatment

Section - III

| | | | | | |
|--|--|--|--|---|--|
| 1. Material This Product Will Be Packaged In: | | | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. 2-24 oz | | No. per container 6-12 | |
| | | If "Yes" Package wgt | | No. per container | |
| 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) plastic bag in box | | | | | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 10 oz, | | 5. Location of Label Directions <input checked="" type="checkbox"/> Printed on box | |
| 6. Manner in Which Label is Affixed to Product | | <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other | | | |

Section - IV

| | | | |
|--|--|-----------------------------------|--|
| 1. Contact Point <i>Complete items directly below for identification of individual to be contacted, if necessary, to process this application.</i> | | | |
| Name Matthew Brooks | | Title Consultant | Telephone No. (Include Area Code) 703-266-0128 |
| <p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p> | | | <p>6. Date Application Received</p> <p align="center">(Stamped)</p> |
| 2. Signature  | | 3. Title Regulatory Consultant | |
| 4. Typed Name Matthew Brooks | | 5. Date 2/8/2011 | |
| | | | 166 |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 9, 2010 (Corrected)

Paragon Household Products
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Decision #442274
332 5-886052
1360

Attention: Dr. Mathew Brooks

Subject Paragon Moth Flakes
EPA Reg. No. 70305-3
Your Notification of November 4, 2010

Purpose The Agency has received your submission for Application for Pesticide Notification under Pesticide Registration Notice (PRN) 1998-10, to include **two** new Alternate Confidential Statements of Formula (CSF) dated November 4, 2010, that show your proposed new source and associated sites of production.

Review The Registration Division (RD) has conducted a review of this request for its applicability under PRN 1998-10 and has found that the action fails to fall within the scope of this PR notice but must be processed as a "**Regular Amendment**" for the following reasons.

1. Because of the ongoing transfer of products, new foreign sites of production, and changes in sources that have been occurring with PDB products, we will require more scrutiny of such actions than in the past.
2. Before we can approve this request, you will need to submit CSFs for the Basic Formulation and each Alternative Formulation.
3. You will also have to provide additional documentation about your source and sites of production.

Review-continued Please be advised that the Agency issued PR Notice 1998-10 as guidance and not as regulations. Therefore, the Registration Division reserves the right to make the above determination, to disapprove this action, to cease processing it as a "Notification", and to process it as a "Regular Amendment". We have updated our records accordingly and will inform you of the results of our review, when completed.

Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-308-0029 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

File Dan Peacock, Flash Drive, 16gb, E:\4G
Location Dan\Doc\Word\Notifications\Letters\Letters DPeacock\70305-3. Not. 11-4-2010, rev CSF, EPA ltr 12-9-2010.doc

November 4, 2010

Document Processing Desk (DCI/PRD)
Daniel Peacock/John Hebert
Biologist/PM Team 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**Subject: Notification of additional alternate CSFs for Paragon Moth Flakes
EPA Registration Number 70305-3**

Dear Mr. Peacock:

Ag-Chem Consulting, on behalf of Paragon Household Products, submits the following notification to add 2 alternate CSFs. Paragon Household Products purchases registered material from the [REDACTED]. Because of the 18 month period for sales of existing stock, Paragon Household Products has material with both registration numbers. These additional alternate CSFs allow Paragon to use all of its existing labeled stock for source material.

Included with this notification are:
One application 8570-1
Two copies of the proposed CSFs

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products.

A collection of 25 small, stylized line drawings of various birds, including sparrows, finches, and songbirds, arranged in a grid-like fashion. The drawings are simple, using only outlines and minimal shading to represent the birds' forms and features like beaks and wings.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number Paragon Household Products/ 70305-03 | 2. EPA Product Manager John Hebert | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Paragon Household Products/Paragon Moth Flakes | PM# 1901 | |
| 5. Name and Address of Applicant (include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of addition of alternate CSFs.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

| | | | | | |
|--|--|---|--|---|--|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | |
| | | | | <input type="checkbox"/> Plastic | |
| | | | | <input type="checkbox"/> Glass | |
| | | | | <input type="checkbox"/> Paper | |
| * Certification must be submitted | | | | <input checked="" type="checkbox"/> Other (Specify) plastic bag in box | |
| If "Yes" Unit Packaging wgt. 2-24 oz | | No. per container 6-12 | | | |
| If "Yes" Package wgt | | No. per container | | | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 10 oz. | | 5. Location of Label Directions <input checked="" type="checkbox"/> printed on box | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | | |
|---|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Dr. Matthew Brooks | | Title Regulatory Consultant | |
| | | Telephone No. (include Area Code) 103-266-0128 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamped) |
| 2. Signature Matthew Brooks | | 3. Title Regulatory Consultant | |
| 4. Typed Name Matthew Brooks | | 5. Date 11-04-10 | |
| 170 | | | |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Matthew Brooks
Paragon Household Products
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

DEC 01 2010

Dear Mr. Brooks:

Subject: Revised Basic CSF
Paragon Moth Flakes
EPA Registration No. 70305-3
Submission Date: October 25, 2010

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated October 25, 2010, for the product Paragon Moth Flakes. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested does not clearly fall within the scope of PRN 98-10. A summary of our findings include:

1. We do not approve registrations with a canceled source.

Please be advised that PRNs are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination. No further processing of this action will occur until a resubmission is made. The RD has determined that this action is denied and our records have been updated accordingly. If you have any questions concerning this letter, please contact me at (703) 347-0156 or urbanski.jennifer@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. Urbanski".

Jennifer Urbanski
Insecticide-Rodenticide Branch
Registration Division (7505P)



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number Paragon Household Products/ 70305-03 | 2. EPA Product Manager John Hebert | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product Name Paragon Household Products/Paragon Moth Flakes | PM# 1901 | |
| 5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(B)(iii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional pages if necessary. (For section I and Section II.)

Notification of revision of basic CSF to change production site.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

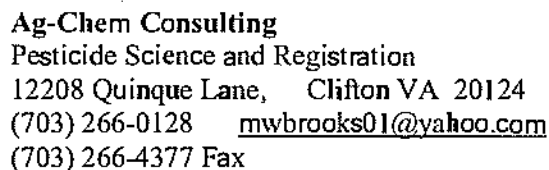
Section - III

| | | | | | |
|---|--|---|------------------------|---|----------------------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | <input type="checkbox"/> Plastic |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. 2-24 oz | No. per container 6-12 | <input type="checkbox"/> Glass | <input type="checkbox"/> Paper |
| | | If "Yes" Package wgt | No. per container | <input checked="" type="checkbox"/> Other (Specify) plastic bag in box | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size of Retail Container 10 oz. | | 5. Location of Label Directions <input checked="" type="checkbox"/> On Container | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | | |
|---|--------------------------------|---|--|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Dr. Matthew Brooks | Title Regulatory Consultant | Telephone No. (Include Area Code) 703-266-0128 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamped) |
| 2. Signature | | 3. Title Regulatory Consultant | |
| 4. Typed Name Matthew Brooks | | 5. Date 10-29-10 | |

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To: Document Processing Desk (DCI/PRD)
Daniel Peacock / John Hebert
Biologist/ PM Team 19
Regulatory Management Branch II
Pesticide Re-evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington VA 22202

From: Paragon Household Products
Company Number 70305-3
c/o Matthew Brooks
Ag-Chem Consulting


**Subject: Notification of Revised CSF for Paragon Moth Flakes
EPA Registration # 70305-3**

Ag-Chem Consulting, on behalf of Paragon Household Products, submits the following Notification of revised basic CSF.

This CSF corrects the registrant address in Box 1 and the production site in Box 2.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

Very Sincerely


Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products

[illegible]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 27 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Raymond E. McCreary
Product Registration
Paragon Household Products, Inc.
P.O. Box 2169, 233 Clifton Blvd.
Clifton, NJ 07015

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request General Label Change and Directions for Use
EPA Reg. No. 70305-3
Application Dated August 31, 2007

Dear Mr. McCreary:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 08/31/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

for Rachel C. Halloran
Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0080, Approval expires 2-28-



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|--|--|--|
| 1. Company/Product Number 70305-3 | 2. EPA Product Manager Daniel C. Kenny | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) PARA MOTH FLAKES | PM# 01 | |
| 5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products Inc. P.O. Box 2169, 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(1)(B), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> First printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor label changes concerning Directions for Use as per PR Notice 98-10. (Section II continues on the attachment)

Section - III

| | | | | | |
|--|---|---|--|---|-------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type or Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> Text <input type="checkbox"/> No | <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | | |
| * Certification must be submitted | | tr "Yes" Unit Packaging wgt. | No. per container | tr "Yes" Package wgt. | No. per container |
| 3. Location or Not Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size of Retail Container | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Attached to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

| | | |
|-----------------------------|--------------------|---|
| Name Raymond E. McCreary | Title President | Telephone No. (Include Area Code) 973-591-0777 |
|-----------------------------|--------------------|---|

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

5. Date Application Received
(Stamped)

| | | |
|--------------------------------------|----------------------------|-----|
| 2. Signature | 3. Title | 175 |
| 4. Typed Name Raymond E. McCreary | 5. Date August 31, 2007 | |

SECTION - II (Cont'd)

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of the 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para
Moth Balls
Cedar Scented**

**KILLS MOTHS AND
CARPET BEETLES**

NET WT.10 oz (283.5 g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

INERT INGREDIENTS:0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2
EPA Est. No. 70305-NJ-01

Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para Moth
Balls
Cedar Scented**

**KILLS MOTHS AND
CARPET BEETLES**

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**

Back Panel

PRECAUTIONARY STATEMENTS **HAZARD TO HUMANS AND DOMESTIC ANIMALS**

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the

following rates:

| Pounds of Product | Area of Tightly Enclosed Space |
|-------------------|--------------------------------|
| 1/4 | Average Garment Bag |
| 1/3 | Large Trunk |
| 1 | 50 cubic feet (Small Closet) |

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
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